

West Lothian Main Issues Report

Proposed Development Strategy for CDAs

The Council's preferred development strategy seeks to continue to support the delivery of Core Development Areas (CDAs). In the MIR the Council proposes as part of its preferred development strategy to allocate a further 400 homes at Winchburgh, as well as an additional 250 homes at Heartlands. Together, these allocations account for almost 20% of the new land releases identified in the Main Issues Report (MIR) of 3,500 homes.

The justification set out in the MIR for the allocation of the additional 400 homes at Winchburgh is *...to improve development viability, maintain investor confidence and reduce the risk that development at Winchburgh will cease because there is insufficient value in the scheme to overcome infrastructure constraints* (paragraph 3.75).

The Council acknowledges that these additional 400 homes are *...unlikely to contribute to the housing requirement for the period up to 2024* (MIR paragraph 3.75).

The Council also proposes to allocate an additional 250 homes at Heartlands, despite confirming that these 250 additional homes *...will not contribute to the housing requirement for the period up to 2024 as it is likely that these additional houses will not be built until after the plan period* (paragraph 3.78).

The additional allocations proposed at Winchburgh (400 homes) and Heartlands (250 homes) cannot contribute to meeting the housing land requirement to 2024. Accordingly, these proposed allocations need to be over and above new allocations required to meet the housing land requirement to 2024.

The Council's approach in the MIR is therefore contrary to the requirements of SESplan paragraph 91 which requires that further allocations may only be *...directed towards existing committed developments if it can be demonstrated that they can contribute towards the housing requirement within the specified time periods*.

The justification given by the Council is that the additional allocation *...will provide an element of future proofing for the LDP and will provide the certainty that investors in this major brownfield regeneration project require for their longer term planning of the development* (MIR paragraph 3.79).

The Council's conclusion that the additional allocations at Winchburgh and Heartlands will not contribute to the housing land requirement in the period to 2024 is supported by Wallace Land. As a consequence, neither of these allocations can contribute to meeting the housing land requirement in full, nor assist the Council maintain a 5 year effective housing land supply at all times.

Completion Rates within the CDAs

At the point of adoption of the Local Plan in 2009, the agreed Housing Land Audit 2009 programmed 865 completions from these CDAs between 2009 and 2016. If this programming was continued to 2019, 1,780 homes were estimated to be built by the end of the initial SESplan period (2009-2019).

By examining the agreed Housing Land Audits 2010, 2011, 2012 and 2013 the completions expected from the CDAs over time is examined in the table below:

	HLA 2009	HLA 2010	HLA 2011	HLA 2012	HLA 2013	Average
Programming	1,780	2,070	2,215	2,140	2,097	2,060

Source: Housing Land Audits 2009-2013

This analysis of recent housing land audits demonstrates that the CDAs have consistently been expected to deliver around 2,100 homes to 2019. The increasing the size of the CDAs through further allocations will not increase the rate of completions from the CDAs. An increase in build rate is a function of market demand and the scale of completions will depend on the location of the CDAs.

A significant component of the established land supply in West Lothian is contained within the CDAs. It is evident that the ongoing development of these large sites will continue to over a long term period, even beyond 2032.

Analysis of the programming set out in Housing Land Audit 2013 can be used to estimate the likely development period for the CDAs to complete. This is set out in the table below.

CDA	Capacity	Estimated Start	Effective Land Supply Completions 2009-2019	Average Annual Completions	Estimated Land Supply 2019-2024	Remaining Capacity Post 2024	Estimated Timescale to Complete
Armadale	2,000	2011	757	95	475	768	8 years
Broxburn	1,550	2016	192	64	320	1,038	16 years
Calderwood	2,800	2013	366	61	305	2,129	35 years
Livingston	2,200	2014	218	44	218	1,764	40 years
Winchburgh	3,450	2013	564	94	470	2,416	26 years
Total	12,000		2,097		1,788	8,115	

Source: Housing Land Audits 2009-2013

It is evident that the CDAs, which form a substantial part of the Established Land Supply, cannot substantially increase their completion rates, at least in the short to medium term. Consequently, the Council cannot rely on increased production from these sites to help maintain a 5 year effective land supply at all times.

Moreover, the allocation of additional land will not necessarily improve the viability of development at Winchburgh or Heartlands. Large scale housing allocations in settlements tend to be developed at a rate of house building set by the local market. Increasing site capacity of a large scale development such as a CDA does not increase its rate of annual house sales. The viability of a large scale housing development is set by its annual development cash flow defined from its annual sales rate.

Conclusion

The additional allocations proposed at Winchburgh (400 homes) and Heartlands (250 homes) cannot contribute to meeting the housing land requirement to 2024. Accordingly, these proposed allocations need to be over and above new allocations required to meet the housing land requirement to 2024.