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Development Planning  
West Lothian Council  
County Buildings  
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EH49 7EZ

By email and post: [ldp@westlothian.gov.uk](mailto:ldp@westlothian.gov.uk)

Dear Sir / Madam

**BANGOUR VILLAGE HOSPITAL  
REF: EOI-0034**

We act on behalf of NHS Lothian and write with reference to our clients interests at the former Bangour Village Hospital. Our clients take a keen interest in issues of development planning and are pleased to respond to the Council's Main Issues Report, in relation to the emerging West Lothian Local Development Plan.

As the Council are aware, NHS Lothian are committed to developing a strategy to secure the redevelopment of the Bangour site, and look forward to working with interested parties and stakeholders in this respect in going forward. Despite actively marketing the site for a number of years, and notwithstanding some developer interest, the Bangour site is clearly complex. NHS Lothian are in the process of procuring a planning and masterplanning team to develop a masterplan for the site and to take forward an application for planning permission in principle. In all likelihood, associated applications for Listed Building and Conservation Area Consent will be included in the exercise.

We attach a copy of an updated title plan highlighting the extent of NHS Lothian's ownership interest at Bangour. The intention of the NHS is that any future masterplan should consider the extent of the NHS ownership interest in its entirety. It is submitted that the Local Development Plan should reflect the extent of the NHS Lothian ownership interest at the site, and identify its extent to be the subject of the masterplanning exercise.

**West Lothian Local Plan**

Since its closure, the site of the former Bangour Village Hospital has been identified by successive local plans as a redevelopment opportunity largely focussed on the residential conversion of the existing buildings.

In considering proposals for housing development, the supporting text of the extant local plan specifically identifies the scale of housing envisaged at Bangour as requiring the provision of a new primary school to be funded by the developer; the scale of which dependant on the ultimate scale of any development proposed.

The local plan notes that there is policy support for the redevelopment of this significant brownfield site. The site benefits from a housing allocation with an estimated capacity of 500 houses. This allocation has increased from previous local plans. The site is identified under policy HOU 1 of the plan highlighting its contribution to meeting the Council's housing requirements over the local plan period, and the longer term.

It is stated that 250 of these units will arise from expansion opportunities across the site over and above those potentially arising from the conversion of the listed buildings.

In discussions with the Council, the total allocation of 500 units is confirmed as relating to both the residential conversion of the existing listed properties across the site and new build. The Council suggest that the total

number of units could vary by + or - 10%. There have been some discussions in relation to the total figure of 500 applying solely to the new build element to maximise the cross funding of the listed buildings across the site.

### **Main Issues Report (MIR)**

Paragraph 3.204 of the MIR acknowledges that *“the former Bangour Village Hospital site has been allocated for housing for a number of years since closure of the hospital but despite some developer interest and various efforts to market the site, there is no planning permission in place.”* It continues that *“the deteriorating condition of the listed buildings is an ongoing cause for concern and the council is keen to see a positive outcome for the site.”*

Paragraph 3.205 states that *“the site is not without its challenges: the cost of refurbishing listed buildings is expensive; and infrastructure costs, especially for education, are high. There are substantive ongoing costs associated with insuring the site. The need to protect and enhance the conservation area, protect the character and appearance of listed buildings and their settings and protect areas of woodland and open space within the site all impose limitations on the development potential of the site. There is an opportunity to consider in this MIR what action the council could take to help ensure that development at Bangour is viable.”*

Bangour is specifically the subject of a series of questions within the Main Issues Report. It is stated that *“The Council’s ‘Preferred’ approach to Bangour Village Hospital site is to support at least 550 houses at the site, with the precise number of houses being agreed through detailed assessment of a master plan and other supporting information. Delivery of the site will be allied to the delivery of the infrastructure required to support the development whilst having regard to the built and natural environment sensitivities of the site.”*

### **Question 74**

Our clients wholeheartedly support the Council's preferred strategy for the site, indeed this can be the only way forward.

Whilst the exact number of houses that could be delivered at the site is as yet unknown, this can only be established as part of the masterplanning exercise. Direction and flexibility in this regard must be provided by the Local Development Plan.

### **Question 75**

Our clients do not agree to the Council's 'Alternative' approach which could seek to restrict the development potential of the site.

To seek to restrict the number of units that might be developed at the site has the potential to further frustrate the redevelopment of the site.

In addition to the built and natural environment sensitivities of the site, as acknowledged by the Council in the Main Issues Report, which will be required to be managed through the masterplanning process there are a number of other constraints which require to be assessed in the delivery of a market facing masterplan.

By seeking to restrict the scale of development at the Bangour site, without the benefit of being informed by appropriate assessment and masterplanning, would potentially undermine the redevelopment opportunity.

### **Question 76**

Whilst very much supporting the development of housing at the Bangour site, the Local Development Plan should acknowledge that the site could support a variety of other uses. Specific reference should be made to this fact within the Local Development Plan as being required to be explored in the context of the masterplanning exercise.

Whilst acknowledging that the redevelopment of Bangour will be residentially lead, the incorporation of the range of uses classes, such as Class 1 (shops), Class 3 (restaurants), Class 4 (offices), Class 7 (hotels) and Class (10)

non-residential institutions, by way of examples, can both assist in creating a community, assist in integrating with the community of Dechmont and fundamentally assisting in delivering the redevelopment of a site such as Bangour.

It is submitted that the Local Development Plan should confirm that alternative uses may also be appropriate as part of a masterplanned approach to the site.

To further assist in the delivery of the site we would also suggest that the preparation of the new plan would be an opportunity to further consider the Conservation Area designation across the Bangour site. A large number of buildings across the site are listed and consequently are already afforded policy protection. Similarly environmental designations exist across the site.

Given the nature of the site presently such a move could assist the redevelopment opportunity. It is submitted that the masterplanned approach to the site is best placed to balance the various challenges that the Council openly acknowledge in the MIR exist at the site, and to help ensure that development at Bangour is viable.

In summary we would comment as follows:-

- NHS Lothian support the preferred strategy of the Council in relation to Bangour.
- We respectfully submit that the site should continue to be allocated as an opportunity within the Local Development Plan preferred housing site, as part of the land supply within the Local Development Plan.
- The Local Development Plan should make reference to the extent of NHS Lothian's interests at Bangour, as identified on the attached title plan, being considered as part of a masterplanning exercise.
- NHS Lothian consider that the Council should supplement its preferred strategy by acknowledging that the site could be appropriate for a range of uses, to be determined as part of the masterplanning approach, to ensure a sustainable development proposal.
- To further assist the delivery of the site, the Council should further consider the Conservation Area status across the site.

We trust that the above and attached will be given due regard in the process to prepare the new Local Development Plan. We would be pleased to be kept advised of the process to prepare the new Plan. Hard copies of the attached submissions will follow by first class post. We would be pleased to arrange to meet with you to discuss matters further should that be appropriate.

Should you have any further queries, please do not hesitate to contact Fraser Littlejohn of this office direct.

Yours faithfully





**MONTAGU EVANS LLP**

cc NHS Lothian

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 LAND REGISTER OF SCOTLAND	Officer's ID / Date	TITLE NUMBER
	4486 12/12/2013	<b>WLN45493</b>
 ORDNANCE SURVEY NATIONAL GRID REFERENCE	Scale	
	1/2500	
	Survey Scale	
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