

## West Lothian Local Development Plan 2 Evidence Report

### Schedule

### 19. Town Centres and Retail

#### Information required by the Act and NPF4 regarding the issue addressed in this section

Town and Country Planning (Scotland) (Act) 1997, as amended:

- section 15(5)(a) ‘the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district’
- section 15(5)(ca)the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people,
- section 15(5)(cd)the health needs of the population of the district and the likely effects of development and use of land on those health needs,

National Planning Framework 4 (adopted 13 February 2023)

- Policy 27 - LDPs should support sustainable futures for city, town and local centres, in particular opportunities to enhance city and town centres. They should, where relevant, also support proposals for improving the sustainability of existing commercial centres where appropriate. LDPs should identify a network of centres that reflect the principles of 20 minute neighbourhoods and the town centre vision. LDPs should be informed by evidence on where clustering of non-retail uses may be adversely impacting on the wellbeing of communities. They should also consider, and if appropriate, identify any areas where drive-through facilities may be acceptable where they would not negatively impact on the principles of local living or sustainable travel. LDPs should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.
- Policy 28 - LDPs should consider where there may be a need for further retail provision, this may be:
  - where a retail study identifies deficiencies in retail provision in terms of quality and quantity in an area; or
  - when allocating sites for housing or the creation of new communities, in terms of the need for neighbourhood shopping, and supporting local living. LDPs should identify areas where proposals for healthy food and drink outlets can be supported.

Linked Policies: 1, 2, 7, 9, 13, 14, 15, 16, 18, 20, 21, 23, 25, 26, 29, 30, 31

This schedule aims not to repeat the content of other topics covered by the LDP2 Evidence Report. Other schedules which should be read alongside this schedule on Town Centres and Retail are:

- Design

	<ul style="list-style-type: none"> <li>• Health and Wellbeing</li> <li>• Historic Places</li> <li>• Local Living</li> </ul>
<b>Links to Evidence referenced in this schedule</b>	<ul style="list-style-type: none"> <li>• Scottish Government, <a href="#">Town Centre Action Plan Review – Joint response from Scottish Government and COSLA</a></li> <li>• West Lothian Council, <a href="#">Existing Network of Centres – West Lothian Local Development Plan (Figure 6, p.36)</a></li> <li>• West Lothian Council, West Lothian Strategic Review of Town Centres – <a href="#">November 2022 Report</a>, <a href="#">June 2023 Report</a>, <a href="#">November 2023 Report</a>, <a href="#">September 2024 Report</a></li> <li>• Scottish Government, <a href="#">Scottish Government Guidance: Local Living and 20 Minute Neighbourhoods</a></li> <li>• ONS, <a href="#">Economic Trends in the Retail Sector, Great Britain: 1989-2021</a></li> <li>• <a href="#">Invest in West Lothian – Retail</a></li> </ul>

## Summary of Evidence

### Purpose, scope and structure of this schedule

This schedule focuses on town centres and retail within West Lothian. The schedule and its evidence are set out in the following sections:

1. National Context – Town Centre Action Plan Review
2. West Lothian Existing Network of Centres
3. West Lothian Strategic Review of Town Centres
4. Local Living
5. Future Retail Capacity in West Lothian
6. Non-retail clusters and healthy food & drink outlets
7. Drive through locations

### Part 1 – National Context

#### Town Centre Action Plan Review

1.1 The Town Centre Action Plan Review (April 2022) builds on the first review of the Town Centre Action Plan in February 2021. The review identifies four actions:

- Putting the right policy framework in place,
- Ensuring the right kind of support,
- Providing a framework for investment, and
- Working closely with partners.

1.2 Planning policy, town centre living, community engagement with LDPs, local living / 20 minute neighbourhoods are mentioned across all four actions.

1.3 Cognisance will need to be taken of the actions and priorities during the preparation of the Proposed Plan.

### Part 2 – West Lothian Existing Network of Centres

## Livingston Sub Regional Centre

- 2.1 Serves council-wide catchment and beyond as sub regional centre to the Lothians in terms of comparison and convenience shopping. Major visitor destination that provides an extensive range of shops, services, leisure activities and community facilities. Contains West Lothian's main bus interchange. The sub regional centre takes in The Centre, the Designer Outlet and retail parks.
- 2.2 Data from The Centre shows an increased rate of vacant in terms of both percentage of units and floorspace. A major cause of the increased vacant floorspace has been the vacancy created by the closure of Debenhams in March 2021.
- 2.3 The Centre has recently obtained planning permission to increase the level of Class 3 restaurant and Class 11 leisure floorspace within the third phase of The Centre to address long term vacancies. Primarily, this recent permission is to enable a leisure use to potentially occupy the vacant, former Debenhams unit.

Year	Vacancy Rate %	Vacant Space (Sq Ft)
September 2018	7.68%	59,872 sq ft
September 2019	11.20%	87,326 sq ft
September 2020	7.50%	58,407 sq ft
September 2021	24.01%	186,903 sq ft
September 2022	21.97%	171,034 sq ft
September 2023	22.91%	178,396 sq ft
September 2024	18.22%	142,038 sq ft

- 2.4 In addition, The Centre has stated they have a number of ongoing negotiations that should ultimately reduce the vacant floor space currently reported at 18.22% as at September 2024.
- 2.5 A request was made to the Designer Outlet to provide occupancy data but no reply was received.
- 2.6 The retail parks to the south of the Designer Outlet are predominately non-food retailers with major tenants such as Next, Dunelm, The Range and H&M. Food retail takes the form of an Aldi supermarket, a Sainsburys supermarket with petrol station and a Morrisons supermarket with petrol station. Other restaurant and leisure uses include a Starbucks drive thru, KFC drive thru, a Chain Runner pub and Pure Gym. The majority of units within the retail parks are occupied with four office units at Almondvale Business Park noted as currently being vacant.
- 2.7 There has been a trend over the last two plan periods towards a greater diversity of uses, subdivision of retail park units and some floorspace restrictions on non-retail uses being amended.
- 2.8 Since the current LDP was adopted in September 2018 there has been further housing granted planning permission within the sub regional centre boundary. This includes at sites MU3

(completed), MU4 (under construction) and MU7 (under construction) on the LDP Proposals Map 3 for Livingston.

2.9 In terms of implications for the Proposed Plan, the sub regional centre will continue to act as a regional destination for shopping and leisure, as well as acting as the town centre for Livingston. The area could be considered for a place/development brief that could provide certainty for owners/occupiers in the area looking to carry out further development. The development of any sites for residential use adjacent the sub regional centre will need to have acceptable walking routes to ensure a local living approach for the area.

### Town Centres

2.10 West Lothian has five 'traditional' town centres in the following locations, which are designated in the current West Lothian LDP:

- Armadale
- Bathgate
- Broxburn and Uphall
- Linlithgow
- Whitburn

2.11 The below tables set out percentage occupancy rates in the five town centres between 2018 and 2024 covering the time since the West Lothian LDP has been in place, as well as the West Lothian average occupancy for town centres between April 2017 and March 2024:

Traditional Town Centre / Average Annual Occupancy	2018	2019	2020	2021	2022	2023	2024
Armadale	85.3%	90.2%	87.0%	85.0%	86.4%	86.2%	90.1%
Bathgate	92.0%	91.6%	92.1%	92.2%	92.5%	91.8%	91.5%
Broxburn & Uphall	91.4%	92.2%	92.3%	93.3%	96.3%	95.7%	95.9%
Linlithgow	89.3%	93.3%	92.3%	92.0%	93.2%	93.4%	90.5%
Whitburn	87.0%	87.6%	87.5%	89.6%	90.2%	90.5%	92.6%

Year	West Lothian TC Average Occupancy
April 2023 – March 24	91.6%
April 2022 – March 23	91.7%
Apr 2021 – March 22	91.9%
Apr 2020 – March 21	91.4%
Apr 2019- March 20	91.9%
Apr 2018- March 19	90.8%

- 2.12 Ryden's Scottish Property Review 2024 notes that the Local Data Company reports that the average retail vacancy rate in Scotland fell by 0.5% in the final quarter of 2024 to stand at 15.7%, compared with 14% for GB. West Lothian's town centre vacancy rates compare favourably with the average Scottish vacancy rate.
- 2.13 NPF 4 policies are likely to be adequate in allowing changes of use within town centre shop unit and assessment of application for residential development for town centre living. If town centre residential sites come forward as part of a call for ideas then it will need to be considered if a place/development brief is required for such sites.

### **Town Centre Public Realm Design Guides**

- 2.14 Public Realm Design Guides (PRDG) were prepared for each of West Lothian's five traditional town centres. The guides generally date from 2009 and were prepared within the context of the West Lothian Local Plan (2009) which has now been replaced by the adopted West Lothian LDP.
- 2.15 A review of the PRDGs was initiated in 2021/2022 with public consultation undertaken. The review set out the projects completed, still progressing and not started with a 'RAG' system. A report was presented to the council's Executive committee stating that the PRDGs require to be updated and to be taken forward as Planning Guidance (PG) in support of the current LDP but also for its forthcoming revision as LDP 2.
- 2.16 These documents have not been translated into planning guidance for the current LDP to date. A further review of whether these documents should be taken forward as planning guidance into LDP 2 should be undertaken given the age of the PRDGs, the council's Strategic Review of Town Centres and relevant NPF 4 policies on town centres and design quality.

### **New Development Town Centre – Winchburgh**

- 2.17 This proposal has been delivered as part of Winchburgh Core Development Area under application LIVE/0719/MS/14. The town centre has been fully built with a supermarket, pharmacy, takeaways and offices all present within the area.

### **Local Neighbourhood Centres**

- 2.18 The West Lothian LDP has 16 designated local neighbourhood centres in the following locations:
- Armadale Core Development Area (CDA)
  - Blackburn
  - East Calder
  - Fauldhouse
  - Livingston – Bankton, Carmondean, Deans, Dedridge, Murieston South, Craigshill, Howden, Ladywell, Knightsridge, Livingston Village
- 2.19 A survey of the majority of shop units within West Lothian was undertaken in 2018 by Planning, which covered the above centres (except for Armadale, see below). Currently, there is no up-to-date info on occupancy / vacancy rates within local centres. This is a gap in data that will need to be addressed as part of the preparation of the Proposed Plan.

2.20 The Armadale CDA local centre application refused (LIVE/0467/MSC/17) in September 2023 due to lack of progress on this application. No further applications have been submitted in respect of this part of the CDA.

### **Commercial Centre – Linlithgow Bridge Retail Park**

2.21 LDP Policy TCR 1 sets out that the Linlithgow Bridge Retail Park is intended to be a complementary retail offer to the town centre.

2.22 Currently, the council does not hold information on occupancy / vacancy rates or uses within this centre. This is a gap in data that will need to be addressed as part of the preparation of the Proposed Plan.

## **Part 3 – West Lothian Strategic Review of Town Centres**

3.1 In November 2022, the council’s Economic Development service commenced a strategic review of the five town centres noted above. Initially, this comprised an assessment of the current economic landscape of town centres and consider any potential changes to town centre management groups.

3.2 A further report in June 2023 recognised the aims and aspirations of NPF 4 and local living, as well as setting out two phases of engagement. Key themes and priorities that emerged from the first phase of engagement were:

- Businesses
- Transport
- Physical Environment
- Tourism
- Community Groups

3.3 Following a second of engagement, which made use of a survey based on the place standard tool, seven actions were set out in November 2023, in relation to the five town centres:

Action 1	Town Centre Management Groups
Action 2	Multi-Service/User Group for Improving Town Centre
Action 3	Review of Shop Front Improvement Scheme
Action 4	Support for Broader Mix of Town Centre Uses
Action 5	Pop Up and Temporary Use for Stalled Sites
Action 6	Support for Small and Independent Business
Action 7	Support for Events and Activities

3.4 Actions 4 and 5 relate directly to planning. Current LDP and NPF 4 policies already provides for a wide range of appropriate town centre uses. Changes to the Use Classes Order and permitted development rights also open up a range of uses that may not require planning permission. NPF 4 Policy 9 gives support to temporary uses for stalled, vacant and derelict sites. NPF 4 Policy 27 supports residential development and conversions to residential, in principle.

3.5 Action 3 relates to the council’s shopfront improvement scheme. The council currently has non-statutory planning guidance (PG) for Shopfronts and Advertisements in Conservation Areas. Consideration should be given for a policy on shopfronts and advertisements across the network of centres, as this is not covered by NPF 4, and an update on the PG as a general guidance note for businesses on shopfronts, advertisements and changes of use.

- 3.6 The results of the place standard tool survey were also published in November 2023. This has provided further qualitative evidence for Chapter 1 of the Evidence Report on West Lothian as a Place.
- 3.7 Continued engagement with Economic Development is required during the production of the Proposed Plan to examine whether any West Lothian specific town centre policies are required beyond relevant NPF 4 policies, alongside a further review of public realm design guides noted above, and whether restrictions are required to prevent further non-retail clusters noted below. Consideration should also be given to development briefs for the Livingston sub regional centre and town centres.
- 3.8 In addition, the strategic review of town centres, and its associated engagement, has acted as a de facto health check for the five town centres. Health checks have not been undertaken by the council since 2007 and further engagement with Economic Development to ensure health checks inform the Proposed Plan. Engagement with Economic Development will also be needed to ensure the Proposed Plan takes account of the council's Economic Investment Plan, which is likely to be published in 2025.

#### **Part 4 – Local Living (20 Minute Neighbourhoods)**

- 4.1 NPF 4 Policy 27 requires LDPs to identify a network of centres that reflect the principles of 20 minute neighbourhoods and the town centre vision. NPF 4 Policy 28 states that allocation of housing sites will need take account of neighbourhood shopping to support local living.
- 4.2 The schedule 17 on Local Living sets out the initial evidence baseline for local living in West Lothian. The existing network of centres will form the basis of facilities for local living in West Lothian, however, further work is be required to identify any gaps in neighbourhood convenience shopping that could inform site allocations for the next LDP. This work will need to take place alongside the production of a retail capacity study (noted below).

#### **Part 5 – Future retail capacity and wider retail trends**

- 5.1 NPF 4 Policy 28 states that “LDPs should consider where there may be a need for further retail provision, this may be...where a retail study identifies deficiencies in retail provision in terms of quality and quantity in an area”.
- 5.2 The council's last retail capacity study was carried out in 2008 by Halcrow Group with a report published in November 2008. The report set out an analysis of future retail needs for West Lothian, in the context of housing allocations, from 2008 to 2026. Since this study was undertaken the great financial crisis, Brexit and the coronavirus pandemic have all occurred in a wider context of an increasingly digitised world.
- 5.3 It is noted that the retail sector was significantly affected by Covid pandemic and there is still some uncertainty to what extent pre-crisis levels will be recovered. The recession of 2008-09 was another factor and since that event sales (particularly in the non-food sector) have been on lower growth trajectory than previously envisaged. Internet sales have been a factor reducing the quantity of expenditure available for shops. A further recent change has been the rise of discounters in the convenience retail sector, which has acted to depress the rise in volume of sales in this sector of the market.

- 5.4 The ONS publication, Economic Trends in the Retail sector 1989-2021 surveys longer-term trends in retailing.
- 5.5 The share of expenditure of total retail sales in non-store retailing reached 16.5% by 2020. Estimating the eventual level of internet based spend is particularly difficult, as the UK is the world's most advanced adopter of internet retailing, so there is no prior example to observe in terms of how far eventual internet penetration might reach. Covid and the recovery period has cast further uncertainty.
- 5.6 According to Invest in West Lothian, the retail industry currently supports 8,000 jobs in West Lothian, with 355 retail businesses active within the county.
- 5.7 The lack of an up-to-date retail capacity study is an identified gap in the evidence based for the Proposed Plan and will need to be addressed prior to the Proposed Plan being published. Budget has been made available and this study will be commissioned shortly.

## **Part 6 – Non-retail clusters and healthy food & drink outlets**

- 6.1 The council holds information on 'non-retail clusters', specifically hot-food takeaways (including permanently sited vans), betting offices and high interest money lending premises, in the five town centres. This data is currently being analysed and will be available when the Evidence Report is submitted.
- 6.2 A survey of the majority of shop units within West Lothian was undertaken in 2018 by Planning. Currently, there is no up-to-date information on 'non-retail clusters' outside of town centres. This is a gap in data that will need to be addressed as part of the preparation of the Proposed Plan.
- 6.3 NPF 4 Policy 28 states LDPs "should identify areas where proposals for healthy food and drink outlets can be supported". These uses are likely to be supported across the network of centres and it will need to be considered if this is explicitly stated in policy.

## **Part 7 – Drive through locations**

- 7.1 Drive throughs are situated at the following locations:
- McDonalds, Almondvale Avenue, Livingston
  - McDonalds, Whitburn Road, Bathgate
  - McDonalds, 2 Heartlands Terrace, Whitburn
  - Starbucks, 11 Almondvale Business Park, Almondvale Way, Livingston
  - Starbucks, 2 Linkston Way, Bathgate
  - Starbucks, Junction 4A, Heartlands Business Park, Whitburn
  - Starbucks, Edinburgh Road, Broxburn
  - KFC, Almondvale South Retail Park, Livingston
  - KFC, Heartlands Business Park, Whitburn
  - Greggs, McDonalds, Starbucks, Deer Park Road, Livingston (consented under application 1179/FUL/22 but not built)
- 7.2 There is a gap in the adopted LDP, which does not contain a policy around locations where drive throughs are acceptable or unacceptable. It will need to be considered whether the Proposed Plan requires a specific policy for areas where drive through development may be acceptable, or restricted, in certain locations.



## **Summary of Stakeholder Engagement**

*This will summarise the steps taken by the planning authority to seek the views of all relevant stakeholders. This will also summarise the views expressed, and explain how they have been taken account of in the Evidence Report.*

## **Statements of Agreement / Dispute**

*This will include statements from stakeholders highlighting their agreement or the areas they dispute.*

## **Summary of Implications for the Proposed Plan**

*This will cover what the evidence means for the plan, e.g. the spatial strategy, the Delivery Programme or plan preparation.*

Based on the evidence the proposed plan is required to:

1. Maintain a network of centres. The existing network of centres should be maintained in the Proposed Plan and its spatial strategy. Development briefs should be considered for the Livingston sub regional centre and any acceptable town centre residential proposals, which are submitted through the Call for Ideas.
2. Make the network of town and local neighbourhood centres form the focal points of Local Living. Further work is required to identify gaps in neighbourhood convenience retailing that could be addressed in the Proposed Plan. How people living in rural areas access facilities and services in their nearest centres will also need to be examined in the preparation of the Proposed Plan.
3. Be informed by a retail capacity study. This study will need to be produced during the preparation of the Proposed Plan to identify qualitative and quantitative deficiencies in retail provision given the last study of this nature was undertaken in 2008.
4. Consider a specific policy on non-retail clusters once the council's 2018 retail unit survey is updated to give a full picture of data across local neighbourhood centres. It is likely that a short policy statement is required to explicitly state support for 'health food and drink outlets' across the network of centres.
5. Consider specific policy on drive throughs. This will impact the spatial strategy given there is currently no West Lothian specific policy for locations where drive throughs are acceptable or unacceptable.