

# West Lothian Local Development Plan

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West Lothian  
Council

The council has commenced preparation of its first *Local Development Plan* (LDP). The LDP will replace the *West Lothian Local Plan* and will set out a local interpretation of the requirements of the *Strategic Development Plan* (SESplan) and national guidance. The LDP is a land use plan that identifies site specific development opportunities, sets out the council's key development priorities and provides the policy context for the consideration of applications for planning permission.

The current *West Lothian Local Plan* was adopted by the council in January 2009 is available to view on the council's website at <http://www.westlothian.gov.uk/WLLP>

The *Main Issues Report* (MIR) for the West Lothian LDP is the first key stage in the preparation of the LDP and we are seeking your views on this. All documentation for the MIR can be viewed at <http://www.westlothian.gov.uk/MIR>

Full details on the timetable and stages for preparing the LDP are set out in the Development Plan Scheme 6 which is also available online:

<http://www.westlothian.gov.uk/article/2725/Development-Plan-Scheme>

A questionnaire to accompany the MIR is set out below and we would be happy if you would complete and return to us.

There are 98 questions that accompany the *Main Issues Report*. You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you. Completed questionnaires should be returned to us by e-mail to [wlldp@westlothian.gov.uk](mailto:wlldp@westlothian.gov.uk) by no later than **5pm on Friday, 17 October 2014**.

Alternatively, please download a copy of the form and send it to us at: Development Planning, West Lothian Council, County Buildings, High Street, Linlithgow, EH49 7EZ (postal address only).

You can keep up to date on the LDP by subscribing to our LDP e-newsletter. If you have not already subscribed, you can do so by going to the following link and following the relevant instructions: <https://newsletters.westlothian.gov.uk/eNewsletterPro/optin/optinealert.htm>

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Please note that any comments you make will be open to public scrutiny, but we will keep your contact details private and confidential and will only use your name or business name.

## **Submission to the West Lothian Local Development Plan – Main Issues Report On behalf of CALA Management Ltd**

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### **Introduction**

This submission is made by Ryden on behalf of CALA Management Ltd (CALA) and relates to the site referenced as Boghall East, Blackness Road, Linlithgow within the West Lothian Local Development Plan – Main Issues Report.

CALA supports the following development proposals for the subject site, as contained within the MIR;

- EOI-0015 – preferred new housing site with indicative capacity of 50 units,
- Eli2 – site to be de-allocated from current class 4 employment use.

CALA also supports the removal of the ‘area of restraint’ restriction in Linlithgow in accordance with the terms of SESPlan, which identifies West Lothian as a Strategic Development Area.

The Council therefore supports the change of use at this site from employment to residential use.

### **Background**

The site is currently the subject of a planning application for residential development of 49 units. The development has been reduced in terms of number of house units and the original proposal was subject to a full Proposal of Application Notice procedure, which produced a modest number of responses. The PAC Report accompanies the planning application. The applicants are CALA Management Ltd and Kensington and Edinburgh Estates. The application was brought forward against the background of a revised strategic planning framework, as laid out in SESPlan. Linlithgow is no longer considered an ‘area of restraint’ but is now identified within a wider Strategic Development Area where smaller scale sites, satisfying local need and supported by local infrastructure are acceptable.

It is anticipated that if planning permission is granted, construction on the site would begin in 2015. At a sales rate of 25 or 30 units per annum the site could be completed by 2018 and certainly by 2019, thus the site would be brought forward within the first period for which SESplan sets housing targets.

The planning application remains live and has yet to be determined. A number of technical issues remain outstanding and the applicants are working with WLC to resolve these issues, which include drainage and education.

### **Key Supporting Issues**

#### Employment land allocation

In relation to the site’s historic employment land status. Scottish Planning Policy confirms that marketable land for employment use should meet business requirements, be serviced or serviceable within 5 years and have a secure planning status. The supply of marketable sites should be regularly reviewed to ensure this meets current and anticipated market expectations. Where identified sites are no longer considered appropriate or marketable, they should be reallocated for another use.

SESPlan clarifies that employment strategies should be focused on maintaining a supply of employment land in marketable locations. Linlithgow is not within the primary economic corridor along the M8 and the town has no strategic employment sites.

An Employment Land and Property Market Review was prepared by Ryden in support of the aforementioned planning application. It analyses the national, regional and local employment markets including availability of land and buildings, demand and take-up characteristics. The report concludes that the loss of this site for residential development will have no impact on the strategic economic land supply.

#### Area of restraint status - Removed

The SESPlan spatial strategy includes the whole of West Lothian as one of its Strategic Development Areas. Para 30 of SESPlan confirms these are the areas to which housing development is to be directed. The Linlithgow 'area of restraint' identified within the Edinburgh and the Lothians Structure Plan has been removed with the approval of SESPlan. Notably, this policy was not an embargo on housing development within the settlement envelope of Linlithgow provided there was infrastructure to support the proposed development.

#### Housing Land Supply

As a consequence of the Scottish Ministers' decision that SESPlan was not ambitious enough, higher housing land requirements are now to be met by each authority through Supplementary Guidance (now approved). This Supplementary Guidance sets the strategic housing requirement for West Lothian as 11,420 housing units for the period 2009 – 2019 and 6,590 housing units for the period 2019 – 2024. For the Council to comply with Policy 5 of SESPlan an additional 2,125 housing units are proposed in West Lothian, principally in the period to 2019.

There is a significant shortfall in the effective housing land supply in the SESPlan period 2013 to 2019 in West Lothian, a fact also confirmed by actual completions compared with the performance required to maintain an effective 5 year rolling land supply.

Linlithgow is a highly marketable location in West Lothian with an unsatisfied demand for housing. The consequence of very limited housing development in Linlithgow over the past ten years is that it has forced prices up, creating affordability problems. This has created a stagnant internal market in the town with limited opportunities to trade up or down. There has also been little affordable housing delivered in this period despite Linlithgow being a priority location for affordable housing need. Housing development at the subject site would assist in meeting housing requirements to 2019, adding to local supply in Linlithgow and delivering much needed affordable housing.

More recently, a letter dated 14 August was lodged by West Lothian Council to the DPEA regarding the ongoing appeal at Burghmuir, Linlithgow. It responds to a request from the Reporter to comment on another appeal Decision Letter at East Whitburn on the issue of maintaining an effective five year housing land supply. Paras 5 and 6 on page 2 of the Council's response refer to the relevance of additional preferred housing sites in the West Lothian Main Issues Report for the LDP. The Council's letter advises its reliance on preferred sites coming into and boosting the housing land supply. The Council uses this as additional evidence to the Reporter, that, notwithstanding any view he may reach on the adequacy or otherwise of existing housing allocations meeting the five year effective housing land supply requirements, these additional preferred sites will add to that supply.

#### Effective and Deliverable Housing Sites

Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits, sets out at paras 55 and 60 criteria against which individual sites can be assessed to be 'effective' and whether they could add to the available effective housing land supply.

In this context we can confirm that;

- The subject site is in the ownership of a party who will release it to CALA in the event planning permission is granted.

- It is free from physical constraints, flood risk, access issues and contamination risk. Services infrastructure is available to support this proposed housing development. Consultation over education provision is ongoing. That said, the Council is predicting completion of this site within the first 5 year period and as such education services will be available to support this development at both primary school and secondary school levels.
- No public funding is required.
- The site is in a highly marketable location for new housing.
- Development could start in 2015 and the development completed by 2019. The site would therefore make an early contribution to the effective housing land supply to 2019 to assist towards achieving a five year supply of effective housing land.

This is an infill site within the town, it is not marketable as an employment site, it is windfall in that it is available, it is integral to a wider residential area, well connected to transport and local services and would be effective if granted planning consent for housing.

## **Conclusions**

- The site lies within the urban boundary of Linlithgow as defined in the adopted local plan and is allocated for development.
- It also lies within a residential area, is bounded by residential properties and residential is the appropriate future use of the site.
- No proposals have come forward for business use on the site since it was allocated for development twenty years ago and analysis of the employment property market in West Lothian demonstrates that this is not a realistic prospect.
- Scottish Government Planning policy supports the reappraisal of employment sites which are no longer marketable and their reallocation for alternative uses.
- The development will provide much needed market housing and affordable housing in a town which, due to previous strategy restrictions, has seen no significant growth in the past 20 years and almost no growth of housing in the past decade.
- Linlithgow is located within a Strategic Development Area in SESplan and housing growth is directed to SDAs.
- An effective 5 year housing land supply is not being maintained in West Lothian as required by Scottish Government planning policy and SESplan.
- Residential development will be complete by 2019 and within the current SESplan period where there is an inadequate supply of effective housing sites in West Lothian.
- This is a Local Scale Housing Development as defined in SESplan and would greatly assist in providing for local needs.
- The site meets the criteria of 'effectiveness' set out in Planning Advice Note 2/2010 and CALA has a proven track record of delivering housing in Linlithgow.
- The design and layout of the site as promoted through the current planning application meets best practice and the Council's requirements.