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**RESPONSE TO WEST LOTHIAN LOCAL DEVELOPMENT PLAN
EXAMINATION – FURTHER INFORMATION REQUEST 03 – ISSUE
1A – HOUSING LAND AND POLICIES HOU1, HOU2 AND CDA1**

04 April 2017

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With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

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PROCESS

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Response to West Lothian Local Development Plan Further Information Request 03, Issue 1A, Housing Land and Policies HOU1, HOU2 and CDA1

Introduction

Homes for Scotland welcomes the opportunity to respond to Further Information Request 03 on Issue 1A of the West Lothian Local Development Plan Examination on housing land and policies HOU1, HOU2 and CDA1.

Our response comprises this written response to Questions 1-7 and Question 20 as requested. The following supporting documents are also submitted.

1. West Lothian Council Housing Land Position Statement, May 2016
2. Edinburgh Local Development Plan Examination Report, June 2016
3. East Dunbartonshire Local Development Plan Examination Report, September 2016
4. SESplan Annual Housing Update 2016, Report to SESplan Joint Committee, March 2017
5. Housing Land Position Statement – Appendix – Housing Land Supply Review, April 2016
6. Housing Land Audits – Homes for Scotland Procedures – May 2015

Question 1

Should the SDP's 'housing requirement' be regarded as a 'housing supply target' or 'housing land requirement' (i.e. already including an element of generosity) as defined by SPP 2014? Table 3.1 of the SDP Housing Land Supplementary Guidance refers to 'housing land requirement'.

- 1.1 Homes for Scotland considers that the SDP's 'housing requirement' should be regarded as the 'housing supply target' as defined by SPP 2014.
- 1.2 This position is supported by a number of points of evidence. Firstly, the West Lothian Housing Land Position Statement (May 2016) states in Paragraph 5.1 "*SDP [1] identified Housing Supply Targets (HSTs) for each SESplan authority to use in preparing their LDPs to meet the housing requirements of SDP [1] and HLSG*" recognising the SDP's 'housing requirement' as the 'housing supply target'.
- 1.3 Secondly, within the Schedule 4 for Issue 1A, the Council states that "*the term Housing Supply Target (HST) should replace references to Housing Requirement (HLR)*", clearly acknowledging that the 'housing requirement'

should be regarded as the 'housing supply target'.

- 1.4 Thirdly, the report of the Edinburgh Local Development Plan Examination states (in Paragraph 8 of Page 128):
“SESplan predates the current Scottish Planning Policy so does not use the word target but refers to housing requirements and housing land requirements. However, for the purposes of the examination there is nothing to suggest to me that the figures in SESplan should not be interpreted as the target.”
- 1.5 Homes for Scotland considers that the Housing Supply Targets that should be adopted within the West Lothian LDP are:
- 2009-2019 - 11,420
 - 2019-2024 – 6,590

Question 2

Given that the LDP must comply with the adopted SDP, notwithstanding that SPP 2014 introduced a requirement for SDPs to include a 10 to 20% generosity allowance, is the addition of a generosity allowance in the LDP necessary and/or justified? Did the concept of generosity feature in SPP 2010 and did this influence the SDP housing requirement? Does the SDP housing supplementary guidance give any consideration to generosity?

Necessity / Justification of Generosity

- 2.1 Homes for Scotland considers that a generosity allowance within the LDP is both necessary and justified.
- 2.2 We acknowledge that West Lothian Council has adopted a 10% generosity allowance for this LDP, clearly accepting the need and justification for this. The Council's Schedule 4 for Issue 1A, and the Housing Land Position Statement (May 2016) paragraph 6.1 – 6.3 acknowledge this. The Position Statement states that the HLR is *“the sum of the number of new homes to be built plus a generosity allowance”* (paragraph 6.1).
- 2.3 The position of accepting the addition of a generosity margin was also accepted by the Reporter in the examination of the Edinburgh Local Development Plan in 2016 who concluded that flexibility through a generosity margin should be applied to the Edinburgh Local Development Plan as this was not included within the approved SDP. The Examination Report states (in paragraphs 18 and 19 under Issue 05):

“Paragraph 116 of Scottish Planning Policy states that within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 - 20% to establish the housing land requirement so that a generous supply of

land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.

In this case such a margin was not included in the strategic plan which pre-dates the current Scottish Planning Policy. Instead the flexibility is added to obtain the housing land requirement for this local development plan. The proposed plan applies a margin of 10% flexibility as indicated in the table below. I return to the matter of the sufficiency of this margin and whether it should be increased below.”

Appropriate level of generosity

- 2.4 A robust justification has not been provided by West Lothian Council to support the selection of a 10% generosity allowance, as required by Scottish Planning Policy 2014 (SPP), as opposed to a higher allowance, leaving us to assume that the 10% has been chosen because it is the lowest percentage acceptable. SPP paragraph 16 states that the Housing Supply Target “...should be increased by a margin of 10 – 20%...the exact extent of the margin will depend on local circumstances but a robust explanation for it should be provided in the plan”. Given the chronic undersupply of homes in West Lothian since 2009, we suggest that there is sufficient justification to raise the generosity allowance to 20% to maximise flexibility and ensure that a generous supply of land for housing is provided.
- 2.5 Further, Homes for Scotland also notes the contrast between this pessimistic stance of adopting a minimum 10% generosity allowance, and the optimistic view on constrained sites coming forward. We suggest that if the Council is to take an optimistic view, then this should be continued throughout and we therefore suggest that this is an argument in favour of the highest level of generosity at 20% being applied.

Generosity in SPP 2010

- 2.6 SPP 2010 did feature the concept of generosity. Paragraph 71 of SPP 2010 states that a “generous supply of land for housing in the development plan will give the flexibility necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur during the life of the plan”. Unlike SPP 2014, the 2010 SPP did not provide any level of “generous supply” that would be acceptable.
- 2.7 Homes for Scotland does not consider that generosity influenced the approved SDP ‘housing requirement (now the HST) in any way. The preparation of the SDP pre-dates SPP 2014, therefore the requirement for 10-20% generosity margin was not a consideration in the preparation of this plan. The generosity margin is required to be added to the HST to give sufficient flexibility over and above the HST to ensure that enough land is available and capable of being delivered to meet the HST in full.

Question 3

What options for calculating the housing land requirement for the remainder of the 10-year plan period beyond 2024 are available, and which of these options should be applied to the plan? The council suggests this calculation should be based on HNDA[2].

- 3.1 The Proposed West Lothian LDP is required to comply with the approved SDP – SESplan 2013, and therefore the HNDA for this approved SDP. As such, an emerging Housing Needs and Demand Assessment (HNDA) is not a relevant consideration for this Plan. HNDA[2] will be taken into consideration as an evidence base for the preparation of SESplan SDP2, but is not relevant for this LDP. We therefore disagree with the Council’s suggestion to base a calculation on the housing land requirement for the remainder of the plan beyond 2024 on HNDA[2].
- 3.2 This position was supported by the Reporter’s conclusions for the East Dunbartonshire LDP Examination. The Examination Report concluded (paragraph 10 of Issue 06) *“it is not appropriate to give any significant weight to the next emerging strategic development plan or the housing need and demand assessment on which it is to be based.”*
- 3.3 SPP (2014) paragraph 119 requires LDPs in city regions to *“allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption.”* The West Lothian LDP is expected to be adopted in 2017; therefore the Plan should set out a HST up to 2027. The relevant SESplan periods are 2009 to 2019 and 2019 to 2024, and a HST must be agreed for the remaining 3 years to 2027 – 2024/25, 2025/26 and 2026/27.
- 3.4 Homes for Scotland supports the methodology agreed by the Reporter in the Edinburgh LDP Examination to annualise the 2019-24 target and roll this out for another 2 years.
- 3.5 Therefore for West Lothian, the HST for 2019-24 of 6,590 should be divided by 5 to give 1,318, the annualised HST for this period. This figure should then be multiplied by 3 to give 3,954, the HST for the final 3 years of the plan period 2024-2027. A generosity margin should then be added (in this case to be consistent with the Proposed Plan, 10% has been added) to give the Housing Land Requirement for 2024-27 of **4,349 homes**.

Question 4

How should the required 5-year effective land supply be calculated where this would span SDP periods? What options are available and which of these should be favoured, and why?

- 4.1 Homes for Scotland considers that an agreed methodology for calculating the 5-year effective housing land supply within the SESplan Annual Housing Update in Table 6 “Housing land supply and delivery programme” which was reported to the SESplan Joint Committee on 13 March 2017. This table demonstrates that West Lothian is not currently maintaining a 5 year effective housing land supply based on the draft 2016 Housing Land Audit which includes Proposed LDP allocations as well as the established housing land supply for West Lothian. Homes for Scotland agrees with the methodology set out within this report.
- 4.2 Homes for Scotland supports the Geddes Consulting table below which clearly and concisely sets out the methodology to calculate the 5-year effective housing land supply where this spans SDP periods. Homes for Scotland uses this methodology consistently across Scotland to calculate effective housing land supply.

Step	Description	Method
A	Housing Supply Target for plan period 1 from Development Plan	
B	Housing Completions to date from Housing Land Audit	
C	Remaining Housing Supply Target for plan period 1	A - B
D	Housing Supply Target for plan period 2 from Development Plan	
E	Annual Average Housing Supply Target for plan period 2, where Y = number of years in plan period 2	D / Y
F	Housing Supply Target to be met for plan period 2, where Z = number of years remaining in the five year period under assessment	E x Z
G	Five Year Housing Supply Target	C + F
H	Five Year Effective Housing Land Supply from Housing Land Audit	
	Shortfall/Surplus in Five Year Effective Housing Land Supply	G - H
	Number of Years Supply	(H / G) x 5
	Percentage of Five Year Housing Supply Target Met	(H / G) x 100

- 4.3 Critical to the calculation of the 5-year effective housing land supply is the consideration of completions to date from agreed Housing Land Audits. This should be subtracted from the HST for the first SDP plan period to give the remaining HST for that first period. The HST for the second plan period should be calculated by working out an annual average for that period by dividing the HST for 2019-24 by 5 and multiplying it by the number by 2 (the number of years from 2019-24 in the 5 year period).

- 4.4 Homes for Scotland is actively trying to agree the 2016 Housing Land Audit with West Lothian Council. The vast majority of sites have been agreed between ourselves and the Council, and we are working through a small list of sites yet to be agreed. We consider that the agreed 2016 Housing Land Audit should be adopted by the Reporter for this LDP as the most up to date evidence base on which to calculate the 5 year effective housing land supply. Based on the draft 2016 Audit, it is clear that the Council has not allocated enough land to meet the HLR in full.

Question 5

If the SDP plan periods must be treated separately, as contended in representations, would it be legitimate for any shortfall in completions and/or effective land supply (if applicable) in the 2009 – 2019 period to be disregarded in the second period (2019 – 2024) when calculating the amount of housing land required?

- 5.1 Homes for Scotland considers that any shortfall in completions in the 2009-2019 period cannot be disregarded in the second period (2019-24) when calculating the amount of housing land required. This shortfall represents housing need which has not been met, and it can therefore not be disregarded.
- 5.2 The Edinburgh LDP examination supports this position. The Reporter concluded (paragraph 30 of Issue 05) that “...*the 2019 target is not expressed as phasing and there is no supporting text in SESplan to support flexibility in its application. The local development plan is required to be consistent with SESplan. I find no justification to conclude that the requirement to 2019 can be set aside*”.

Question 6

In the event of there being less than a 5-year effective land supply at any point during the plan period, does Policy HOU2 (and/or Policy HOU3) and/or SDP Policy 7 provide an appropriate policy response? Please give reasons for your answer and outline any alternative / additional policy provisions you consider to be necessary.

- 6.1 Homes for Scotland does not consider that either Policy HOU2 or Policy HOU3 are appropriate policy responses to a shortfall in the 5-year effective housing land supply. We suggest that wording should be added to Policy HOU2 or Policy HOU3 to support housing release if a 5 year effective housing land supply is not maintained. We also consider that further allocations should be made to ensure that a 5 year effective land supply can be maintained at all times, to be compliant with Scottish Planning Policy. Allocating land for housing upfront in the development plan (rather than

relying on a policy which seeks to rectify a failure to maintain the 5 year effective housing land supply in a more reactive way) will be preferred to support delivery of homes in West Lothian as soon as possible.

- 6.2 We consider that the revised wording set out by the Reporter in the Edinburgh Local Development Plan examination would be accessible. The Reporter recommended the new Policy HOU1 for Edinburgh, and Part 2 would be relevant to include within the West Lothian LDP:

“Where a deficit in the maintenance of the five year housing land supply is identified (as evidenced through the housing land audit) greenfield/greenbelt housing proposals may be granted planning permission where:

- a) The development will be in keeping with the character of the settlement and the local area*
- b) The development will not undermine green belt objectives*
- c) Any additional infrastructure required as a result of the development and to take account of its cumulative impact, including cross boundary impacts, is either available or can be provided at the appropriate time.*
- d) The site is effective or capable of becoming effective in the relevant timeframe.*
- e) The proposal contributes to the principles of sustainable development.”*

- 6.3 We do note that some Homes for Scotland Members have concern about the cumulative impact assessment requirement as part of this policy within the Edinburgh Local Development Plan, and as such we would caveat the use of this policy to where cumulative impact is only a consideration where there is a clear and specific potential impact. The provision of evidence on this should, again, only be required where there is an identified issue and there is data available to assess this.

Question 7

Should there be a reference in the plan to explain how the housing land requirement in any future adopted SDP would be applied to the calculation of a 5-year effective housing land supply?

- 7.1 Homes for Scotland does not consider that there should be a reference in the Plan to explain how the housing land requirement in any future adopted SDP would be applied to the calculation of the five year effective housing land supply. Any future emerging SDP is not relevant for the Proposed West Lothian LDP, which is required to comply with the approved SESplan SDP.

Question 20

On a site-specific basis, which of the council's assumptions regarding housing supply from constrained sites coming forward are disputed, and why?

20.1 Homes for Scotland notes that West Lothian Council has produced a "Housing Land Position Statement" in May 2016. In the first instance we would note that this Position Statement was not subject to consultation, therefore Homes for Scotland has not agreed this Statement. The table "Housing Land Supply Review (April 2016)" appendix which supports the Position Statement was also not agreed with Homes for Scotland. This Appendix has been used as the basis for the Council's assumptions of constrained sites coming forward in response to this question.

Housing Land Audit 2016

20.2 The most up to date agreed Housing Land Audit is the 2014 Audit. Homes for Scotland was invited to respond to the 2015 Housing Land Audit, and made full comments in July 2016, however in September 2016, West Lothian Council confirmed that it would 'park' this Audit and publish it on its website as a disputed Audit, while concentrating on the 2016 Audit.

20.3 Homes for Scotland has been actively engaging with the Council in 2017 to agree the 2016 Housing Land Audit. Initial comments were submitted by Homes for Scotland to the Council on 3rd February 2017, and a meeting was held on 21st February 2017 between Homes for Scotland representatives and West Lothian Council to discuss comments made to the Audit. Further to this, Homes for Scotland has followed up with the Council on a number of issues. We now await further response from West Lothian Council on points of clarification and other issues. The vast majority of sites have now been agreed, with a small number of sites still under discussion. There is no reason why this Audit cannot be agreed in advance of the proposed Hearing session. Homes for Scotland is committed to working with the Council to agree this Audit as soon as possible.

20.4 Homes for Scotland considers the 2014 Audit to be an out of date position on land supply for West Lothian. An agreed 2016 Housing Land Audit should be used as the most up to date agreed position. The programming set out within the Housing Land Supply Review (April 2016) should not be considered for effective and established sites as this programming has been superseded by the 2016 Housing Land Audit which has almost reached agreement.

20.5 Homes for Scotland does not consider that sites listed as constrained within the 2016 Housing Land Audit should be programmed for delivery in any way given their agreed status as constrained. We do not consider it appropriate for this Housing Land Supply Review (April 2016) to include constrained sites. However we have commented in detail within the table below.

20.6 This table is set out in a traffic-light form, with sites in green indicating sites for which Homes for Scotland has no dispute, and sites in red where Homes for

Scotland dispute's the Council's position as set out within the April 2014 Review. The majority of sites are noted as amber for now. The Council has not provided evidence and reasoned justification to demonstrate why this site should or will come forward in the stated timescales. We note that the Council has been asked by the Reporter under Question 11 of this Further Information Request to provide this information, therefore Homes for Scotland will comment further on these sites in response to the Council's answer to Question 11.

Homes for Scotland Audit Procedures

- 20.5 Homes for Scotland has submitted its publication from May 2015 "Housing Land Audits: Homes for Scotland Procedures" in support of our response to Question 20. This document explains how Homes for Scotland seeks to contribute towards the preparation of Housing Land Audits, and gives information on default assumptions on lead in times for developments.
- 20.6 On page 5 of the HFS Audit Procedures document, we set out default assumptions on lead in times for delivery. We consider that lawful completions will not begin within 2 years of receipt of planning permission in principle.
- 20.7 Therefore we consider that constrained sites within the 2016 Housing Land Audit will not be able to deliver in 2018/19 as suggested in many cases in the April 2016 Review. This is picked up within the table below.

Housing Land Supply Review (April 2016)

- 20.8 In order to respond to this Further Information Request, Homes for Scotland has reviewed the appendix spreadsheet in terms of the constrained sites that the Council has programmed to come forward. Our analysis is set out below within the table.
- 20.9 There is no key made available with the Housing Land Position Statement (May 2016) Appendix 1 – Housing Land Supply Review (April 2016), therefore Homes for Scotland has made the assumption that the programmed sites in red are those which are constrained sites from the 2014 Audit which are expected to become effective. These are listed in the table below, along with a number of other sites within the appendix which feature in green, but are in fact constrained within the draft 2016 Housing Land Audit. We suggest that it would add clarity if the Council could make a key available to support this 2016 Review.

Homes for Scotland Comment on Constrained Sites from the West Lothian Housing Land Supply Review (April 2016)

Site Ref	Site Name	Position in 2014 HLA	Position in 2016 HLA	HFS Comment	HFS Conclusion
Addiewell & Loganlea					
26/8	Meadowhead Ave (North)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
26/6	Loganlea Cres / Place	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Armadale					
1/25	Muirfield, North Street	C	removed from audit	HFS disputes the assumption that this site will come forward in 2020/21 as this site is no longer within the Housing Land Audit. The site has been removed from the draft 2016 Audit, and this position has not been challenged by HFS. Therefore this site is no longer a constrained site, and should not be programmed for delivery.	Disputed
1/28	Heatherfield (west)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
1/29c	Nelson Park / Mallace Avenue	C	E	This site is programmed within the 2016 draft HLA for delivery of 16 homes in 17/18 and 10 homes in 18/19. This is a WLC site, and the Council has confirmed that this site is	No Dispute

				within the current programme for delivery. HFS therefore does not dispute this site coming forward, and has agreed the programming within the draft 2016 HLA	
CS	Colinshiel (Site B)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
none	Drove Road	not in audit	C	<p>This site is marked in green in the Housing Land Supply Review (April 2016) despite being constrained within the 2016 Housing Land Audit.</p> <p>This site appears on the April 2016 Housing Land Supply Review in green with 26 homes programmed for delivery in 18/19. This position was not queried by HFS during Audit discussions. We suggest, in line with HFS Audit procedures, this site is highly unlikely to deliver in 18/19 as it agreed to be constrained within the 2016 Audit.</p> <p>HFS cannot comment further on this site at the moment - WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
Bathgate					
2/106	Balmuir Road (former Woodthorpe Garden Centre)	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 3 homes in 18/19 from this site. We suggest, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.	Further Info Required

				HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	
2/98a	Easton Road / Balmuir Road (Sibcas site)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
2/85b	Main Street, Bathgate	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
2/100	Jarvey Street	C	TBC	This is a site under discussion between WLC and HFS for the 2016 Housing Land Audit. An appeal was submitted for this site, and for the 2016 Audit end date of 31 March 2016 no decision had been made on this appeal. Therefore HFS considers that this site should remain Constrained for the 2016 Audit. However we acknowledge that the appeal was allowed in August 2016 and we therefore expect the 2017 Audit to include programming for this site as an effective site. We do not dispute supply from this site coming forward.	No dispute
2/109	9 Hardhill Road (former creamery garage)	removed from audit	not in audit	This site was removed from the 2014 HLA. The reasons for removal as stated by the Council were “Not an allocated Local Plan Site / Expired Consent”. This site is not in the 2016 draft Housing Land Audit and HFS has not disputed this position. We therefore do not consider that this site should be programmed to come forward.	Disputed

Blackburn					
3/2(2)	Daisyhill Road	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of the site in 18/19. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
3/27	Riddochhill Road	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
3/32	West Main Street (West)	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
3/33	West Main Street (East)	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
3/36	16 Bathgate Road	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required

Blackridge					
31/5a	Allison Gardens (Site A)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 10 homes in 17/18 and 24 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
31/5d	Allison Gardens (Site B)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of this site in 18/19. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
31/12	Westcraigs Road (south of railway line)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
31/13	Craiginn Terrace	C	C	This is a constrained site within the 2016 HLA. HFS did not	Further Info

				<p>query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 24 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Required
31/11	Woodhill Road	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Breich					
21/4	Rashiehill Crescent	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
21/5	Woodmuir Road (East)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Bridgend					
21/4	Willowdean (Site A)	?	?	This site reference 21/4 is listed in the 2014 Audit as “Rashiehill Crescent” – as a Constrained site. However this site is for 5 units only, rather than the 40 listed within the Housing Land Supply Review (April 2016). We therefore	Clarification Required

				<p>query the Site reference number in this review. The Site name "Willowdean (Site A)" does not appear in the 2014 agreed HLA.</p> <p>The site reference 21/4 does not appear in the draft 2016 HLA. The site name "Willowdean (Site A)" is listed on the main schedule. While the draft HLA states a total of 40 units of which 20 were to be delivered in 17/18 and 20 in 18/19, this has been amended through the HLA meeting between WLC and HFS. An application by Lochay Homes was approved, with a condition limiting delivery to 3 homes per year. HFS has agreed to this programming. The 2016 HLA should be used as the most up to date point of reference for "Willowdean (Site A)"</p> <p>It is not clear from the Housing Land Supply Review (April 2016) which constrained site is referred to. Homes for Scotland requires further information on this to comment with clarity.</p>	
Broxburn / Uphall					
none	Greendykes Road	C	C	<p>This site as allocated within the Proposed LDP is larger than the Persimmon land holding, therefore further information is required on the developer / promoter of the remainder of this site.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required

4/22	Holmes North (Site B)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 5 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
4/49	Holmes North (Site C)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 4 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
4/29	Albyn	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 24 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p>	Further Info Required

				HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	
CW	Candleworks	E	C	<p>This site is marked in green in the Housing Land Supply Review (April 2016) despite being constrained within the 2016 Housing Land Audit.</p> <p>HFS cannot comment further on this site at the moment - WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
GE	Greendykes Road (East)	C	C	HFS cannot comment on this site at the moment - WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Dechmont & Bangour					
5/5	Bangour Hospital Village	C	TBC	<p>This site was marked as constrained in the draft 2016 HLA and HFS made no query or dispute on this. However, at the HLA meeting between HFS and WLC, the Council suggested that this site should be brought into the main schedule from the constrained schedule as there is a current appeal ongoing on this site.</p> <p>This site is subject to ongoing discussion with WLC as part of our move to agree the 2016 HLA.</p> <p>The HFS position is as follows. The date of the submission of the appeal was the start of March 2016, therefore the</p>	Discussions on HLA 2016 ongoing

			<p>appeal had been submitted in the time period for this Audit, however the Appeal has not been determined as yet. The DPEA website states that the current situation is that the Reporters are currently writing up a report for submission. WLC's comments within its Schedule 4 for the Proposed LDP on Issue 10 – Allocation of Land for housing in Dechmont state “...with regard to an increase in numbers from 550 to 800, it has been the council's position for some time that the site cannot accommodate such a high number of units without a major detrimental impact on the landscape framework and conservation area around the former buildings. It has already increased the number of units from 500 to 550 after review. To add a further 250 units or more units as the consultant suggests as the feasibility work on the existing buildings progresses, is to overdevelop the site and negate the woodland framework which the original hospital was developed around. It would also not respect the conservation area nor the conversion of a large number of the listed buildings.” HFS therefore considers that this represents the Council's settled view on this site. At the time of the Audit, no decision had been made to change that, so this site should remain constrained until such time as an appeal decision in favour of development has been achieved, allowing development to be programmed for this site.</p> <p>This is the current HFS position. This position may change as we discuss this site further with WLC as part of the HLA 2016 discussions ongoing. We await WLC response on this,</p>	
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				and will continue to actively pursue agreement of this Audit.	
East Calder					
6/16	Millbank Depot	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
6/15	Camps Cottage	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 1 home in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA. HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
6/17	Broompark Farm	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 24 homes in 18/19 from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA. HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come	Further Info Required

				forward.	
Fauldhouse					
7/24	Meadow Crescent	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of the site in 18/19. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
7/25	Shotts Road	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
7/30	Breich Water Place (formerly Croftfoot Drive)	C	E	<p>This site was moved out of the constrained sites list for the draft 2016 HLA, to the effective/established sites spreadsheet. This was not disputed or queried by HFS. The 2016 Audit confirms that this site is under construction and completions are programmed in 16/17, 17/18 and 18/19.</p> <p>Given its agreed position in the 2016 Audit as effective, HFS does not dispute this site.</p>	No dispute
7/38	Sheephousehill (north)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 24 homes in 18/19</p>	Further Info Required

				<p>from this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	
7/39	Lanrigg Road (3)	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
Kirknewton					
9/11	Station Road (East)	C	C	<p>HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required
9/12(2)	Camps Junction (East)	C	C	<p>This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of the site in 17/18. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	Further Info Required

9/14	Station Road (South Extension)	C	C	This is a constrained site within both the 2014 and 2016 HLAs. HFS did not query or dispute this during Audit discussions for the 2016 HLA. The April 2016 Review programmes the delivery of 10 homes in 15/16, 10 homes in 16/17 and the final 10 homes in 17/18. We dispute this programming given that the site is agreed to be constrained within the 2016 Audit and no homes have been delivered to date.	Disputed
Livingston					
EE5B	Ballantyne Place (South)	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of the site in 18/19. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA. HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
MS8	Murieston (South) (8)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	
B16	Calder Road, Bellsquarry	not in audit	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required

C35	Ettrick Drive, Craigshill	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
C003	Forth Drive, Craigshill	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
DDER1	Dedridge (East)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
D127	Deans (West) / Hardie Road	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of the site in 18/19. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA. HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
AV008	Land north of Almondvale Stadium	C?	E	This site reference AV008 is constrained within the 2014 Audit, however the details refer to 164 homes at Almondvale Stadium rather than the 17 homes referred to in the 2016 Housing Land Review. Within the 2016 Audit, site AV008 refers to land north of	No dispute

				Almondvale Stadium which is in the effective/established supply spreadsheet. Homes for Scotland has agreed this site with WLC as it is in the current WLC home building programme for 20 homes, with delivery of 10 homes in 17/18 and the other 10 in 18/19.	
GF	Gavieside Farm	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Longridge					
11/1	Curling Pond Lane	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
11/11	Fauldhouse Road (North)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Mid Calder					
99/4A 99/4B	New Calder Paper Mill	C	E	This site is currently under construction; therefore HFS does not dispute the delivery of this site. We did not dispute the programming set out within the draft 2016 HLA by the Council, and consider this to be the most up to date position for this site, rather than the programming set out within the 2016 Land Supply Review	No dispute
Pumpherston					
27/5	Pumpherston Golf Course	C	not in audit	While this site is included in the 2014 Audit as a constrained site, HFS cannot locate this site within the 2016 Audit within	Further Info Required

				any schedule – completions, constrained, effective/established or in removed sites.	
				HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward given that it does not appear in the 2016 Audit.	
Stoneyburn / Bents					
13/12	Stoneyburn Farm (East)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
13/13	Stoneyburn Farm (West)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
13/15	Stoneyburn Workshops, Foulshiels Road	C	C	HFS disputes the programmed delivery of this site in 16/17 in the April 2016 Land Supply Review given that this site is agreed as constrained within the 2016 Audit.	Disputed
West Calder & Harburn					
CB	Cleugh Brae	not in audit	not in audit	HFS cannot locate this site under the site reference CB and site name Cleugh Brae in either the agreed 2014 or the draft 2016 Audit. Further information is required from WLC before comment can be made on this site.	Further Info Required
Westfield					
16/3 16/4	North Logie Brae and South Logie Brae	C	C	This is a constrained site within the 2016 HLA. HFS did not query or dispute this during Audit discussions. The April 2016 Review programmes the delivery of 24 homes in 18/19	Further Info Required

				<p>on this site. We suggest that, in line with the HFS Audit procedures, this is highly unlikely given that this site is agreed to be constrained in the 2016 HLA.</p> <p>HFS cannot comment further on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.</p>	
Wilkieston					
32/1	Linburn	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
Winchburgh					
18/5	Castle Road	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
18/13	Dunn Place (Winchburgh Primary School)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
NN	Niddy Mains (North)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
CP	Claypit	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been	Further Info Required

				provided to demonstrate why this site should / will come forward.	
NS	Niddry Mains (South)	C	C	HFS cannot comment on this site at the moment – WLC evidence base / reasoned justification has not yet been provided to demonstrate why this site should / will come forward.	Further Info Required
H-WB 14	Main Street (former Beatlie School and Winchburgh Day Centre)	not in audit	TBC	During Audit discussions, WLC confirmed that this site is due to be marketed in 17/18. However, no programming has yet been agreed for Winchburgh sites and HFS is waiting for an updated position from WLC on an education solution for Winchburgh before agreeing any programming. We dispute the programmed delivery in 15/16 of 4 units as this did not take place. HFS cannot comment further on this site until these discussions have been finalised for the 2016 HLA.	Discussions on HLA 2016 ongoing
H-WB 15	Glendevon (regeneration site)	not in audit	?	<p>Site H-WB 15 in the draft 2016 HLA is named “Land at Glendevon Farm and Glendevon Steading”, and is 1.95 ha in size, being developed by Stewart Milne. 35 of the total 38 units were completed by end March 2016, with the final 3 programmed for 16/17.</p> <p>It is unclear whether this is the site referred to in the April 2016 Housing Land Review. This site has the same LDP reference, however is for 0.8ha and a total of 27 units.</p> <p>HFS requires further information on this site to be able to comment fully on the programming or nature of the site.</p>	Further Info Required

KEY:

C	Constrained
E	Effective/Established
	Disputed
	No Dispute
	Further Info Required

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