



# West Lothian Council

## THE WEST LOTHIAN LOCAL DEVELOPMENT PLAN (LDP)

### CONSULTATION RESPONSE PORTAL

#### Have Your Say on the Proposed Plan

#### Introduction

West Lothian Council has published its Proposed Plan together with supporting documents including an Environmental Report (SEA), Habitats Regulation Appraisal, Strategic Flood Risk Assessment and Equalities & Human Rights Impact Assessment. These can be viewed on the West Lothian Council website at [www.westlothian.gov.uk/proposedplan](http://www.westlothian.gov.uk/proposedplan).

If you wish to make representations on the Proposed Plan or associated documents you are encouraged to use this online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

You do not need to complete this questionnaire in a single visit. Just simply put your Survey Reference Number (CODE) in the top right corner of the screen to allow you to continue with your submission at a later date.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the Local Development Plan and ask for it to be logged and directed to the Development Plan and Environment Team. Someone will contact you. Alternatively you can email us at [wlldp@westlothian.gov.uk](mailto:wlldp@westlothian.gov.uk) We will endeavour to respond as quickly as possible but in any event within 3 working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

#### Data Protection Statement

*Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).*

*We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination in Public of the Proposed Plan to discuss your representation.*

*Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.*

## 1. GENERAL INFORMATION

### Your Details

Please indicate in what capacity you are making this submission: \*

Please note that this is a mandatory field

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information: \*

Please note that this is a mandatory field

Title

First Name

Surname

Email Address

Telephone

Postal Address

Organization Name

Client's Name

Is this the first time you have made a written representation on the Proposed Plan? \*

Please note that this is a mandatory field

- yes
- no

If you have previously submitted a site to be considered for development when the Council was initially seeking Expressions of Interest (EOI), or commented on the Local Development Plan at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you

Enter EOI (Expression of Interest) reference here

Enter MIRQ (Main Issues Report) reference here

Please enter your survey reference number in the text box below. \*

Survey Reference Number (CODE) can be found in the top right corner of this screen  
 Survey Reference Number (CODE) will allow you to save your responses and return to finish the survey later

Please keep a note of your Survey Reference Number (CODE) for future reference

Please note that this is a mandatory field

## 2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

## 3. BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

#### 4. CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

#### 5. ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the Council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning (Scotland) Act 2006 and what documents will accompany the plan i.e. the Action Programme etc.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

The role and purpose of the plan is generally supported but, as detailed within this representation, [REDACTED] do not agree with the statement in Paragraph 3.1, whereby it is stated that the LDP has been prepared under the terms of Scottish Planning Policy 2014 (SPP14). SPP14 requires LDP's to ensure that a generous supply of housing land is provided and a 5 year effective housing land supply is maintained at all times.

As set out within this document and also detailed by Homes for Scotland, the minimum requirement of a 5 year supply of housing land has not been provided by WLC in the Proposed LDP, therefore additional housing must be allocated within the plan to allow it to adhere to SPP14.

In particular, SPP Paragraph 123 states, "Planning authorities should actively manage the housing land supply. They should work with housing and infrastructure providers to prepare an annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process, and housing completions, to ensure a generous supply of land for house building is maintained and there is always enough effective land for at least five years".

The principle of the role and purpose of the plan is supported, but on the basis that it does not meet SPP requirements for housing land, the plan fails to meet its required objectives.

#### 6. VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant sub-section(s) of Vision Statement and Aims from the list below.

- Economic Development and Growth (page 8)
- Community Regeneration (page 8)
- Sustainable Housing Locations (page 9)
- Infrastructure Requirements and Delivery (page 9)
- Town Centres and Retailing (page 9)
- The Natural and Historic Environment (page 9)
- Climate Change and Renewable Energy (page 9)
- Waste and Minerals (page 9)

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Sustainable Housing Locations (page 9)

The vision statement and aims are generally supported, however in order to support the section on Sustainable Housing Locations, WLC must demonstrate an effective supply of housing land. Until the housing land supply meets the SDP requirement, as detailed hereafter, and a five year effective supply is demonstrated, this key aim will not be achieved.

## 7. THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant sub-section(s) of the Spatial Strategy from the list below.







- Economic Development and Growth (page 12, paragraphs 5.11-5.22 )
- Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)
- Enterprise Areas (page 17, paragraphs 5.24-5.25)
- Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)
- Tourism (page 17, paragraphs 5.27-5.28)
- Promoting community regeneration (page 19, paragraphs 5.29-5.35)
- Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)
- New Housing Sites and Design (page 24, paragraphs 5.4-5.56)
- Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)
- Whitburn/Charette (page 26, paragraph 5.62)
- Linlithgow and Linlithgow Bridge (page 26-27)
- Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)
- Affordable Housing (page 27, paragraphs 5.69-5.74)
- Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)
- Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)
- Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)
- Providing for Community Needs (page 32, paragraphs 5.85-5.88)
- Education (page 32, paragraphs 5.89-5.92)
- Healthcare Provision (page 33, paragraphs 5.93-5.96)
- Sports Facilities (page 33, paragraphs 5.97-5.101)
- Green Infrastructure and Green Networks (page 34, paragraphs 5.102-5.105)
- Water and Drainage (page 34, paragraphs 5.106-5.107)
- Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)
- Roads (page 35, paragraph 5.113)
- A71 Corridor (page 35, paragraphs 5.114-5.115)
- A801 Corridor (page 35, paragraphs 5.116-5.117)
- A89/A8 (page 35, paragraphs 5.118-5.126)
- Rail (page 37, paragraphs 5.127-5.130)
- Walking and Cycling (page 37, paragraphs 5.131-5.132)
- Town Centres and Retailing (page 39, paragraphs 5.133-5.138)
- Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)
- Countryside Belts (page 42, paragraph 5.144)
- Development in the Countryside (page 42, paragraphs 5.145-5.147)
- Lowland Crofting (page 44, paragraphs 5.148-5.152)
- Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)
- Forestry (page 46, paragraphs 5.156-5.163)
- Union Canal (p.49 paragraphs 5.164-5.165)
- Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)
- Country Parks (page 50, paragraph 5.169)
- Allotments/Community Growing (page 51, paragraphs 5.170-5.171)
- Temporary/Advance Greening (page 51, paragraphs 5.172-5.174)
- Biodiversity (page 52, paragraphs 5.175-5.180)
- Geodiversity (page 53, paragraph 5.181)
- West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)
- Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)
- Conservation Areas (page 55, paragraphs 5.185-5.188)



- Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)
- Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)
- Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)
- Listed Buildings (page 58, paragraphs 5.185-5.187)
- Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201)
- Historic Battlefields (page 60, paragraph 5.202)
- Archaeology (page 60, paragraph 5.203)
- Scheduled Monuments (page 60, paragraphs 5.204-5.206)
- Public Art (page 61, paragraphs 5.207-5.208)
- Climate Change Measures (page 62, paragraphs 5.209-5.214)
- Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)
- Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)
- Energy and Heat Networks (page 66, paragraphs 5.226-5.229)
- Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)
- The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)
- Air Quality and Noise (page 70, paragraphs 5.240-5.242)
- Edinburgh Airport (page 71, paragraph 5.243)
- Noise (page 71, paragraph 5.244)
- Contaminated Land (page 71, paragraphs 5.245-5.246)
- Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)
- Minerals and Waste (page 73, paragraphs 5.251-5.256)
- Site Restoration (page 75, paragraphs 5.257-5.238)
- Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)
- Waste (page 76, paragraph 5.260)

**Please use the text box below for your comments.**

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

The spatial strategy focuses on the established growth areas set out within the previous Structure Plan and current SESplan. It is noted in Paragraph 5.4 that additional allocations will be required to meet SESplan requirements in full whilst Paragraph 5.5 notes that major development outwith the previously established CDA locations will be resisted unless meeting specific planning aims. SESplan Figure 7 highlights the Strategic Development Area for West Lothian and this diagram should be included within the LDP for clarity. This also demonstrates that new housing can come forward in a wider range of locations on the basis they can address SESplan Policy 7 considerations in relation to infrastructure, settlement character impact and Green Belt objectives. With regard to Housing Land Requirements for the LDP, Paragraph 5.38 states that the LDP has been prepared in the context of SESplan and refers in Figure 3 to the SESplan requirements across the periods 2009-19 and 2019-24. However, it is noted in Paragraphs 5.38-5.41 that WLC refer to the Housing Needs and Demand Assessment 2 (HoIDA2) which has been prepared as a preliminary stage of the emerging SESplan2. As confirmed via recent appeal decisions at Linlithgow (Clarendon Farm and Burghmuir), the use of HoIDA2 is not deemed appropriate at this stage as it is set to inform a SESplan which has not yet been prepared. The findings of HoIDA2 will not be translated literally into spatial strategy and associated housing land requirements in SESplan2 - the document is an information base from which to then make planning policy decisions. As such, there is clear guidance from the Scottish Government via the recent appeals that WLC cannot utilise HoIDA2 figures at this stage and it is therefore irrelevant in the preparation of the current LDP which must conform to the currently approved SESplan. References to HoIDA2 should therefore be removed from the LDP. John [REDACTED] therefore object to the reasoning behind the failure of WLC to meet SESplan requirements for the period 2009-19, as set out in LDP Figure 5. It is noted in Figure 5 that allowing for LDP allocations there would be a shortfall of 3,623 units in the first SESplan period to 2019 with a surplus of 3,656 units in the second SESplan period (2019-24) with an overall surplus of 33 units across the whole plan period. Notwithstanding the failure to meet SESplan requirements to 2019, there are points to note in terms of the calculation of these figures. Firstly, in terms of the WLC figures, we would note the following:- For 2009-19, the total supply from existing sources (I) should read 7,416 with the associated target for LDP allocations (J) being 5,146 and the shortfall in this period (L) being 3,650 For 2009-24, the total supply from existing sources (I) should read 15,711 with the associated target for LDP allocations (J) being 4,100 and the surplus in this period (L) being 6 The statement that the overall SESplan target to 2024 has been met clearly masks the disproportionate undersupply of housing land within the first period of the plan (to 2019) and the associated oversupply within the second period of the plan. The LDP therefore fails to meet the requirements of SESplan or of SPP in terms of constantly providing a minimum of a 5 year effective housing land supply The correct calculation, utilising the WLC figures, would therefore be an overall surplus of just 6 units, which is hardly generous or providing flexibility over and above the minimum 10% additional allowance included. Secondly, as noted by Homes for Scotland, we would note the following points in terms of a more accurate assessment:- Paragraph 5.48 states that programming within the agreed 2014 HLA has been reviewed but there is no industry agreement to revisions Constrained sites should not be included in the 2009-19 figures as if they are constrained in the 2014 HLA there is little prospect of them contributing towards the first SESplan period The allowance of constrained sites for the second SESplan period is too high (currently 3,716) and there is no compelling evidence (as set out in SPP Paragraph 15) in terms of this figure within the calculation of the housing land supply Taking the above into account, this fundamental aspect of the plan is flawed and should be addressed by bringing forward additional deliverable short term housing sites. To illustrate the above, Table 1 mirrors the housing supply element of Figure 5 within the Proposed LDP but amends calculations to remove constrained sites from 2009-19 and 2019-24 given the lack of evidence to support inclusion at this stage. The table retains the WLC estimated programming of the effective land supply and estimated programming of LDP allocations. Table 1 demonstrates a substantial reliance upon constrained sites for WLC's housing land supply without which land for a further 4,352 units would be required across the plan period with the majority within the immediate, short term period. To illustrate further, Table 2 highlights the shortfall in the context of the 5 year effective housing land supply requirement (and the agreed 2014 HLA) and demonstrates that West Lothian have a current shortfall of 5,323 subject to contribution from new LDP sites. On the basis that only 1,496 units are estimated to be derived from LDP sites to 2019, this leaves a substantial shortfall of 3,827 units. In order for this shortfall to be addressed, it is appreciated that a significant increase in the rate of housing completions is required. WLC are obliged to facilitate the identified housing land requirements and therefore it is clear that additional housing outlets will be required across West Lothian in the short term and a 'no action' policy is not acceptable. Also, as set out within SPP Paragraph 116, WLC must justify the application of a 10% generosity allowance as opposed to 20%. Reference to the SESplan paper 'Maintaining a Five Year Effective Land Supply' (May 2015) in Paragraph 5.51 should be deleted as this was not consulted upon and has no material status. Paragraph 5.52 should be amended to reflect the need to meet requirements for both SESplan periods. Paragraph 5.53 & 5.90 state the responsibility of providing additional education infrastructure is placed on housing providers. Whilst the application of developer contributions is accepted policy, there is a fundamental requirement for WLC to forward-fund infrastructure via a long-term funding mechanism and then recoup costs. Without a clear commitment to infrastructure delivery, WLC will wholly fail to meet its housing growth requirements and associated economic aims. Furthermore, the last sentence refers to the approach to assessing the 5 year effective land supply which is not yet applicable in the context of the current LDP. Policy HOU2 should be amended with the word 'endeavour' deleted. WLC are required to maintain a 5 year effective land supply via SPP and SESplan and this policy should be amended to provide criteria by which to assess new sites (in line with SESplan Policy 7) to contribute to identified housing land shortfalls.

Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)

Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)

Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)

Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)

Healthcare Provision (page 33, paragraphs 5.93-5.96)

See comment on Housing land requirements (tables contained within supporting document)

See comment on Housing land requirements

Policy I1F1 requires amendment with Supplementary Guidance on developer contributions not yet produced or consulted upon.

Policy HOU8 is not accepted as developer contributions towards healthcare is unreasonable, unquantifiable and addressed by other funding.

## 8. DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

Do you wish to make a comment?

yes

no

If you wish to make comments please begin by selecting the relevant Settlement(s) from the list below.

- Addiewell & Loganlea (page 79)
- Armadale (page 80)
- Bathgate (page 81)
- Blackburn (page 82)
- Blackridge (page 83)
- Breich (page 83)
- Bridgehouse & Bridgecastle (page 83)
- Bridgend (page 83)
- Broxburn (page 84)
- Burnside (page 84)
- Dechmont & Bangour (page 85)
- East Calder (page 85)
- East Whitburn (page 86)
- Ecclesmachan (page 86)
- Fauldhouse (page 86)
- Greenrigg (page 86)
- Kirknewton (page 87)
- Landward area (page 87)
- Linlithgow & Linlithgow Bridge (page 89)
- Livingston (page 90)
- Longridge (page 93)
- Mid Calder (page 93)
- Hewton and Woodend (page 93)
- Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)
- Polbeth (page 93)
- Pumpherstoun (page 93)
- Seafield (page 93)
- Stoneyburn/Bents (page 94)
- Threemiletown (page 94)
- Torphichen (page 94)
- Uphall (page 94)
- Uphall Station (page 94)
- West Calder & Harburn (page 95)
- Westfield (page 95)
- Whitburn (page 96)
- Wilkieston (page 97)
- Winchburgh (page 97)

Please enter site reference(s)/proposals reference (as appropriate) and location/site address below.

Site Reference/ Location / Site Address can be found in the relevant Settlement Statement

	site reference	location/ site address
Dechmont & Bangour (page 85)	H-DE 2	Main Street, Dechmont

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Comment

Dechmont  
&  
Bangour  
(page 85)

Introduction The site is currently allocated for housing in the Proposed LDP following its inclusion as a preferred housing site within the LDP Main Issues Report stage. Representations were submitted to the Call for Sites exercise in 2011 and the M R in October 2014 and a Planning Permission in Principle application was submitted in August 2014 (Ref.0586/P/14) outlining scope for approximately 120 units. An appeal was subsequently submitted on non-determination grounds in October 2015 (DPEA Ref.PPA-400-2059) which is currently under consideration.

Notwithstanding the background studies supporting the 120 unit proposal, the site has been allocated for just 60 units (increasing from 30 within the MIR). It is noted that the site area for the proposed site in the LDP is 6.2 hectares which reflects the application site but the LDP map for Dechmont appears to be only half this area, as detailed hereafter. It remains the view that the site can comfortably accommodate 120 units as outlined in the application and still allow for a substantial area of open space and woodland to form a strong eastern edge. On the basis of the clear housing land supply shortfall identified in Part 1 of this representation, [redacted] object to the stated capacity of Site H-DE2 and seek amendment from 60 to 120 units.

**Site Description** The site, as noted within Figure 2, is located on the eastern edge of Dechmont, a small town located immediately north of Livingston and the M8 motorway. The site is bound by established housing to the west, a continuation of Dechmont Main Street to the north, the A899 and tree-line to the east and a combination of established housing, mature woodland and the A89 to the south. The site extends to approximately 15 acres and comprises a mix of grazing land and rough scrubland and woodland. Mature trees and hedgerow bounds the east and north of the site, which create a strong sense of containment.

**LDP Site Assessment** The LDP MIR's supporting Strategic Environmental Assessment stated that, "land between the edge of Dechmont settlement envelope and the A899 represents a logical area for the village to extend into, with the A899 providing a clear defensible boundary...". The assessment goes on to say that, "this general area, close to Dechmont roundabout on the A89, is already quite urbanised, more so with the recent opening of Dobbies and the justification for sustaining the Livingston Countryside designation here is just that little bit less convincing than it perhaps once was". The site is located within the Bathgate Hills Landscape Character Area (LCA), as defined by the West Lothian Landscape Character Area Classification (August 2014) and is not subject to any protective landscape designations with the Landscape and Visual Impact Assessment which supported the planning application providing a positive analysis. Site Capacity Proposed LDP Page 85 of the LDP notes a proposed capacity of 60 units for Site H-DE2 on a site area of 6.2 hectares. The supporting plan (LDP Map 5) for Dechmont is included at Figure 3 which shows the eastern site boundary leaving a residual area outwith the settlement boundary towards the A899. Appendix 2 (Page 177) outlines the requirements for the site which includes a "requirement to accommodate a landscaped no build zone of at least 70m depth, located west of the site boundary with the A899". Whilst objecting to the site capacity, it should also be noted that the residual area in Figure 2 between the site allocation and the A899 extends to greater distance than 70m. Implications of existing Site Capacity Development on the site is generally supported by WLC and the eastern boundary of the A899 is established as the natural extent of development as per the aforementioned LDP Site Assessment. A development of 60 units as per the Proposed LDP would require an unreasonably large extent of new woodland and, based on the actual measurements, potential some residual 'left over' land between new housing and woodland. There is no detailed landscape justification to support the requirement for a 70m width woodland as proposed. The area for new woodland is also outwith the site boundary in terms of any planning application boundary. Proposed Site Capacity The indicative site layout contained within the planning application provides for 120 units. This is supported by a full Transport Assessment (scale of development can be accommodated within the current road network), a Landscape and Visual Impact Assessment (key views can be maintained with landscape impact mitigated through design), Ground/Services Study (no physical restrictions), Flood Risk Assessment/Outline Drainage Strategy (scale of development can be accommodated whilst retaining flood risk area and allowing for suitable surface water management) plus archaeology, ecology and education capacity studies. The proposals allow for a 30m-40m width of woodland on the site's eastern edge to form a clear and defensible boundary to development and retain a sense of transition between Livingston and Dechmont. Therefore, in general capacity terms, the proposed scale can be accommodated as illustrated in Figure 4 on Page 8. Proposed Site Density The 120 units are contained within a net developable area of 3.55 hectares (8.77 acres) with the gross site area being 6.2 hectares (15.36 acres). This equates to a density of 19-34 dwellings per hectare (8-14 dwellings per acre) depending on whether gross or net site area is utilised (it is noted that the Council's Residential Development Guide Supplementary Planning Guidance 2013 states a preference for gross site areas to be utilised to calculate density). This is based upon a mix of cottage flats, terraced, semi-detached and detached units and the site layout allowing for approximately 2.65 hectares of amenity open space and landscaping of varying forms, comprising formal parks, an extensive area on the south-eastern edge including playing field/play area, semi-natural greenspace, SUDS and woodland, woodland/landscaped buffers on northern/western edges and a significant woodland buffer (of varying width between 30m to 40m) on the eastern site edge. In terms of open space provision, the proposals provide a generous allowance with a variety of active open space types. The Council's Residential Development Guide SPG does not provide specific open space requirements but reference is made to the National Playing Field Association '6 acre standard' for 'outdoor play space', i.e. 2.4 hectares per 1000 persons. Whilst this is generally applicable across a wider area in line with the Council's Open Space Strategy, it should be noted that the indicative design would require an allowance of 0.86 hectares if accommodated all on site (120 units x 3 persons = 360 persons; 0.36 x 2.4). As noted above, the proposals actually provide well in excess of this at present. The indicative density generally accords with 'medium' density levels of 30 dwellings per hectare, as outlined within Paragraph 6.39 of the adopted West Lothian Local Plan and the aforementioned design SPG, which states that: "housing density should always relate to the character of the wider area and its accessibility. However, in order to sustainably meet long term housing needs, it is important that new developments are designed to make the best and most efficient use of the land available. Typically, higher densities help to reduce land take and contribute to the viability of local services and public transport, and, as a general rule, the council will encourage higher density housing developments within and adjacent to town centres, adjacent to public transport facilities and along key transportation corridors where appropriate" (Page 15). Additionally, the SPG reinforces this point by stating, "to sustain local services and public transport, minimise land take for new development and promote social inclusion, new housing developments within the CDAs are expected to provide a diversity of house types, tenures and densities, and within the mixed use areas listed in policies CDA 7 - CDA 9, net housing densities should average at least 25 residential units per hectare" (Page 16). By way of comparison, housing developments within Dechmont provide the following densities: - Craiglaw (2 storey terraced/semi) 35-52 dwellings per hectare (83 units on 1.6 hectares or 2.4 hectares including adjoining roads and verge landscaping) - Badger Wood (1&2 storey bungalows/detached) 17 dwellings per hectare (23 units/plots on 1.37 hectares) - Burnhouse Drive (1 storey bungalows) 15 dwellings per hectare (16 units on 1.05 hectares) - Deerhill (2 storey terraced/semi including open space) 30 dwellings per hectare (34 units on 1.12 hectares) - Burnside (2 storey terraced/semi) 35 dwellings per hectare (48 units on 1.37 hectares) Overall, it is considered that the proposals provide for a highly suitable density in terms of both policy guidance on medium density development, optimising the use of greenfield land and within the context of surrounding housing densities. The eastern boundary (A899) is referred to within the Council's own LDP environmental assessment as the most appropriate long term boundary and the proposals provide for extensive woodland to create a strong visual barrier and edge to Dechmont. In this respect, it is clear that the site capacity for Main Street as presently proposed in the LDP is too low and that site capacity should be amended to 120 units which would allow for the sustainable use of the whole site as illustrated in the application indicative site layout in Figure 4. Key Assessments As part of the current PPP application, [redacted] have commissioned a full range of supporting assessments which have been submitted to the Council. These include the following:- Housing Land Assessment Design Statement Education Capacity Appraisal & Addendum Pre-application Consultation Report Landscape and Visual Impact Assessment Archaeological Assessment Habitat Survey Transport Assessment Desktop Ground & Services Study Coal Mining Risk Assessment Flood Risk Assessment & Outline Drainage Strategy Copies of all documents have been provided on a CD under separate cover for ease of reference for subsequent LDP examination.

## 9. APPENDICES (page 99)

A number of appendices are included at the end of the LDP which provides additional detail on specific elements of the Proposed Plan.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Appendix(es) of the Proposed Plan from the list below.

- Appendix 1 - Employment Land Allocations (page 99)
- Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)
- Appendix 3 - Schedule of Land Ownership (page 259)
- Appendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)
- Appendix 5 - List of Policies (page 273)
- Appendix 6 - List of Proposals (page 275)

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)

p.177 - Dechmont Site H-DE2: Site capacity to be amended from 60 to 120 and woodland buffer amended from 70m to 30m minimum - see supporting document for full justification

Appendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)

Developer Contributions and Education Strategy - both fundamental documents required and LDP strategy at risk without availability of detail.

## 10. GLOSSARY (page 280)

An explanation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

## 11. PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Proposals Maps from the list below.

- Proposals Map 1 - West Lothian
- Proposals Map 2 - Linlithgow & Broxburn Area
- Proposals Map 3 - Livingston Area
- Proposals Map 4 - Bathgate Area
- Proposals Map 5 - Villages

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Proposals Map 5 - Villages

Dechmont - as detailed within supporting document, site boundary for Proposed Housing Site H-DE2 to be extended to A899.

## 12. ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Accompanying Documents from the list below.

- Strategic Environmental Assessment (SEA) Environmental Report.
- Equalities & Human Rights Impact Assessment (EQHRIA).
- Strategic Flood Risk Assessment (SFRA).
- Habitats Regulations Appraisal.
- Transport Appraisal (TA).
- Action Programme.

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Strategic Environmental Assessment (SEA) Environmental Report.	<input type="text"/>
Equalities & Human Rights Impact Assessment (EQHRIA).	<input type="text"/>
Strategic Flood Risk Assessment (SFRA).	<input type="text"/>
Habitats Regulations Appraisal.	<input type="text"/>
Transport Appraisal (TA).	<input type="text"/>
Action Programme.	<input type="text"/>

### 13. ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

- yes
- no

Please use the text box below for your additional comments on the LDP.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Representation supporting document for John Macfarlane and Colin Macfarlane has been submitted to the Council by CD today (20/11/15) with supporting key assessments for ease of reference.

Before pressing the submit button please review your submission and make any changes. Once you have pressed SUBMIT you will be unable to go back to the survey.

Once we have received your submission we will send you a copy for your records. This could take up to 5 working days. If you do not receive a copy in that time please contact the Customer Service Centre.

### CONFIRMATION OF YOUR PARTICIPATION

We will send you an email notification as soon as your survey is submitted.

Please enter your email address below.

# Location Plan - Main Street, Dechmont, West Lothian



© Crown copyright/database right 2010.



Scale: 1/2500 @A3

