

Representation to
West Lothian Local Development Plan
Main Issues Report

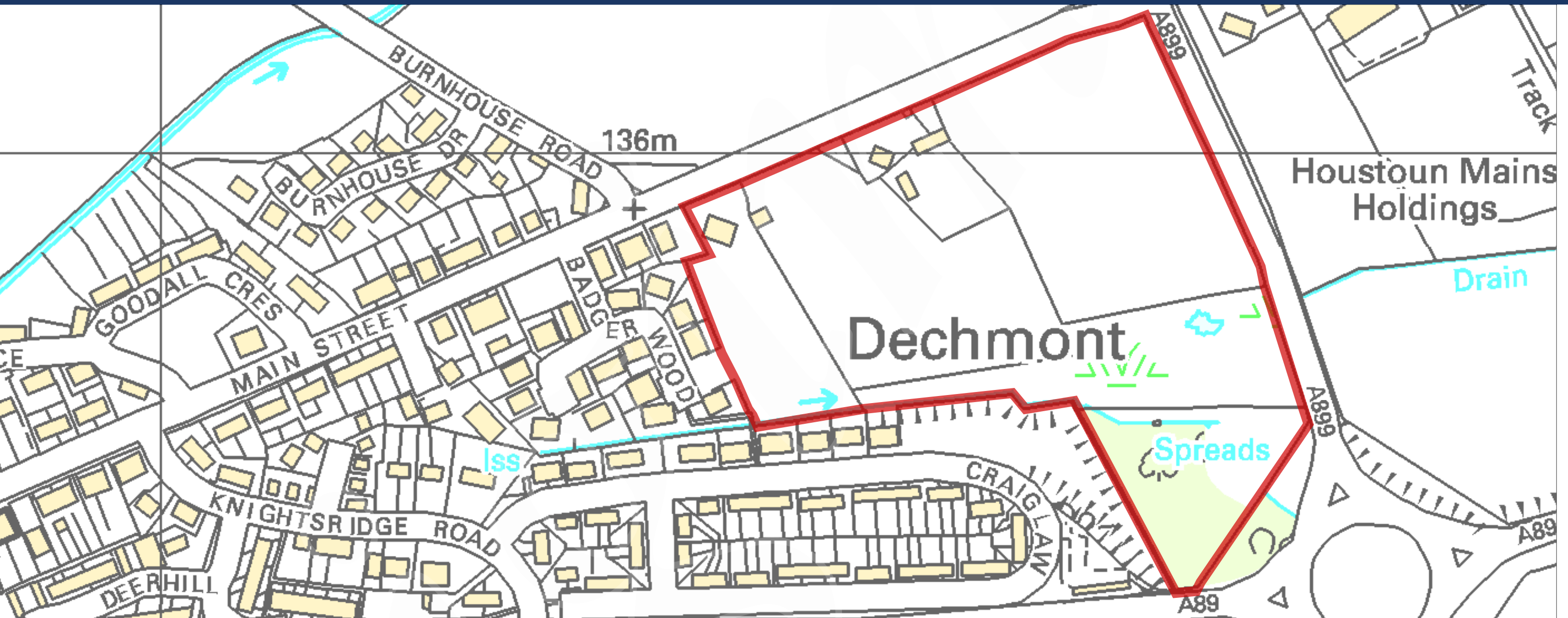
In Support of
Main Street, Dechmont, West Lothian

Prepared by
Clarendon Planning and Development Ltd

On behalf of



October 2014



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Introduction

Clarendon represent [REDACTED] and wish to take this opportunity to confirm the development capability of land at Main Street, Dechmont and clear potential to contribute to the current housing land requirement within West Lothian through the Local Development Plan period.

This representation addresses the specific questions raised within the West Lothian Council Local Development Plan Main Issues Report (the 'MIR') and is structured in order of ease of reference to these questions.

The report also relates to previous promotion via the Council's 'Call for Sites' exercise in August 2011 and the current planning application (in principle), registered by the Council on 26th August 2014.

As outlined hereafter, **whilst current support by the Council for the subjects as a 'preferred' housing site is welcomed, this representation seeks to reinforce the potential scale of housing achievable on the site (and sustainable use of the whole MIR boundary) and seeks an amendment to site capacity as an allocated site within the Proposed Local Development Plan. Furthermore, the similarly preferred site at Burnhouse Road is not supported for the reasons outlined.**

The representation addresses the following questions within the MIR.

- LDP Vision Statement & Aims (Q 1-4)
- LDP Housing Strategy (Q 15-19)
- LDP Affordable Housing & Infrastructure (Q 35-41)
- LDP Settlement Statements - Dechmont Site Ref. EOI-0166 (Main Street) & PJ-0006 (Burnhouse Rd)

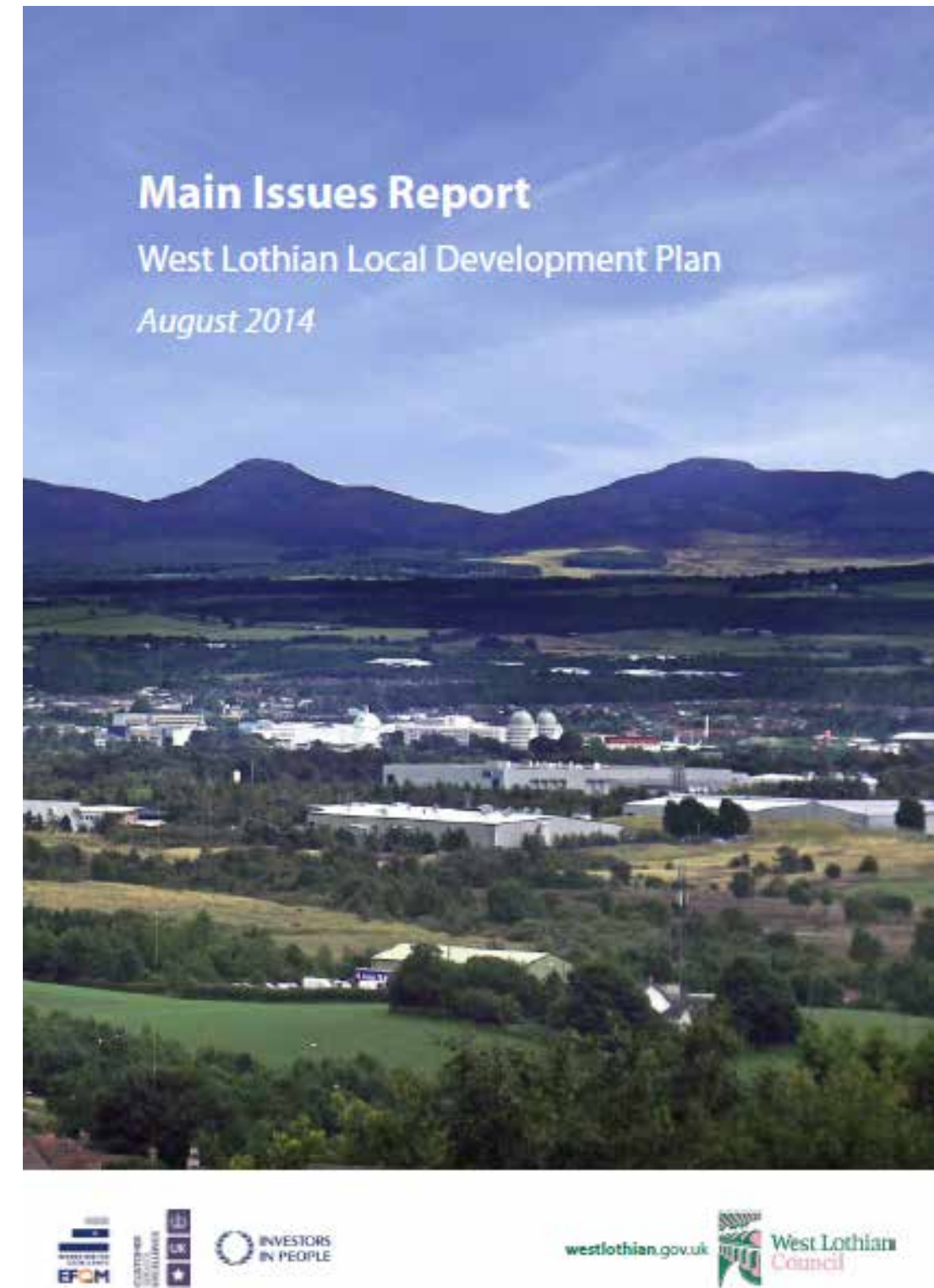


Figure 1 - West Lothian Council LDP Main Issues Report

LDP Vision

The West Lothian Local Development Plan 'Vision Statement' is **supported** and in particular, the importance of West Lothian in relation to the Edinburgh City Region.

As such, allocation of sufficient housing land is crucial, both in terms of deliverable sites which can contribute to the effective land supply and facilitating well considered urban growth for the medium to longer term growth of West Lothian's towns.

LDP Aims Main Issue 3

With specific regard to 'Main Issue 3', LDP aims are **supported** in terms of the need for the Council to, "provide a generous supply of housing land and provide for an effective five year housing land supply at all times".

The provision of land for housing and the timely release of that land to enable building of homes is, arguably, one of the key elements of the West Lothian LDP.

In providing a generous housing land supply the Council need to meet obligations set out within the approved SESplan and associated Supplementary Guidance in terms of addressing both periods 2009-19 and 2019-24.

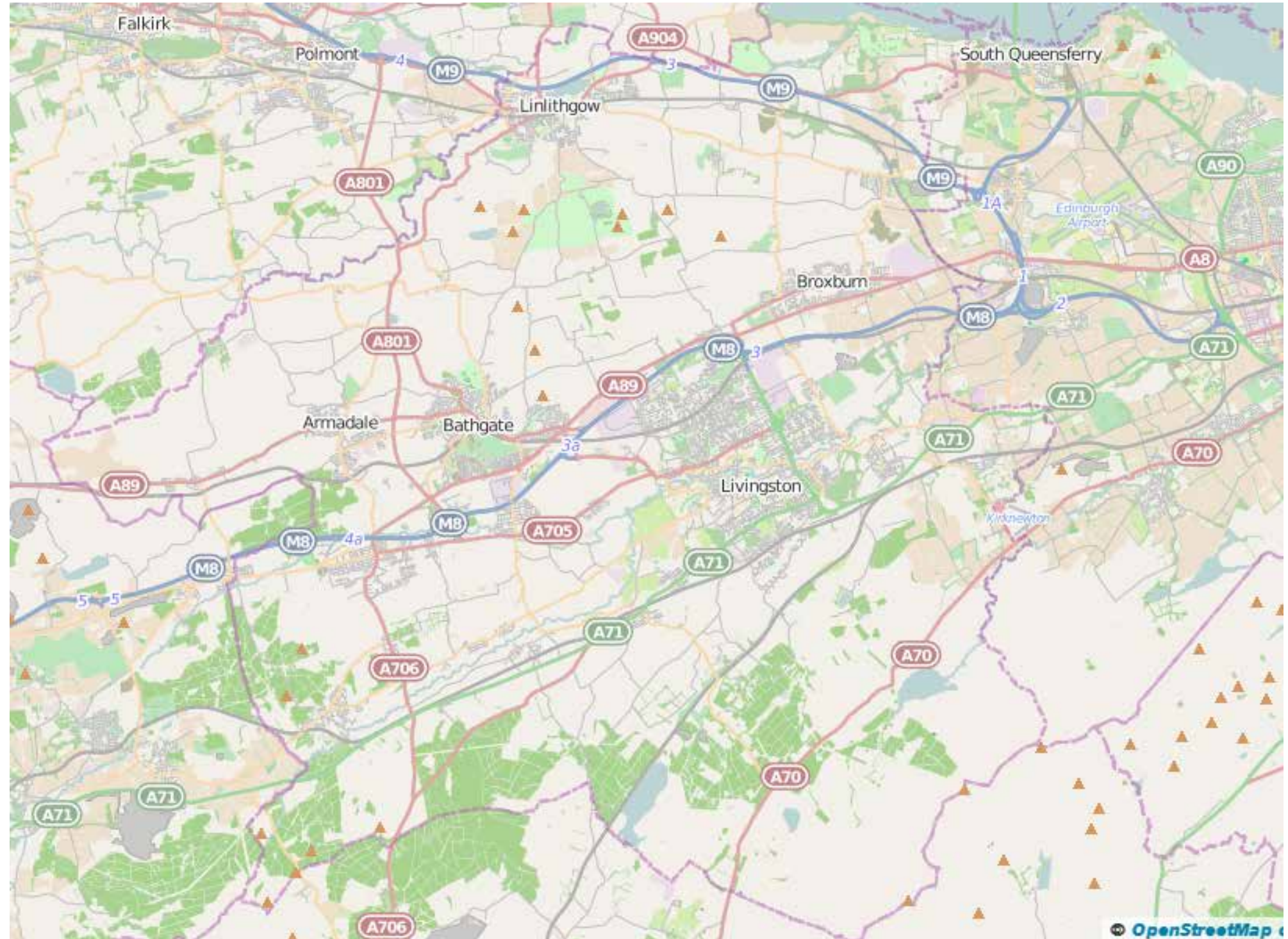


Figure 2 - West Lothian Context Map

LDP MIR Housing Strategy

Questions 15 - 19

Q15 - Preferred Strategy
 Q16/Q17 - Alternative Strategies
 Q19 - 5 Year Effective Housing Land Supply

Whilst the positive MIR strategy is noted and supported in general, the actual housing land requirements and associated calculations are not supported. In this respect, West Lothian must meet the needs of both SESplan periods as well as maintaining a 5 year effective land supply.

The requirement upon Local Authorities to maintain a generous land supply at all times, including a minimum 5 year effective housing land supply, is firmly established in national planning policy. Housing land deliverability is critical in terms of meeting demand and its importance is elaborated upon within *Scottish Planning Policy (SPP) (Scottish Government, updated June 2014)* and the *National Planning Framework 3 (Scottish Government, June 2014)*, which is reflected at regional level by the approved South-East Scotland Strategic Development Plan ('SESplan') (June 2013).

SESplan Supplementary Guidance on Housing Land is also a key material consideration. Following public consultation, ratification by participating local authorities and submission to the Scottish Government, Ministers issued a letter on 18th June 2014 seeking a modification to ensure the Guidance accorded with SESplan in requiring housing requirements for both periods 2009-19 and 2019-24 to be met in full (with associated impact upon defining how a 5 year land supply is to be calculated). It is understood that this modification will be adopted by SESplan, subject to ratification by member local authorities by the end of October 2014. In approving the LDP MIR for consultation on 19th June 2014, West Lothian Council were aware of the modified SESplan requirements.

Housing Land Requirement

SESplan Supplementary Guidance confirms the requirement for West Lothian in 2009-19 as 11,420 units with a further 6,590 units in 2019-24. As noted above, this agreed housing land requirement should form the basis of calculating a 5 year effective land supply requirement.

Based on the SESplan requirements and SPP requirements to build in a minimum 10% flexibility allowance, this provides for the following:

Net Requirement 2009-19	11420
+10% Flexibility Allowance	1142
Total Requirement 2009-19	12562
Net Requirement 2019-24	6590
+10% Flexibility Allowance	660
Total Requirement 2019-24	7250
Net Total Requirement 2009-24	19812

From this requirement, we can deduct completions for the period 2009-13, as detailed within agreed Housing Land Audits 2010-2013, comprising 1,825 units (543/530/229/523).

This provides for a **net 2013-19 requirement of 10,737 units** (12562-1825), equating to an annual average of 1790 completions.

Utilising this requirement, the **5 year Effective Land Supply requirement is 8,950 units** (5x1790).

Housing Land Supply

West Lothian HLA 2013 programmed completions for the period **2013-2019** comprise the following:-

- 2013/14 573 units
- 2014/15 649 units
- 2015/16 755 units
- 2016/17 875 units
- 2017/18 773 units
- 2018/19 711 units
- Total **4336 units**

The above programming indicates a **5 year Effective Land Supply of 3625 units**.

For the period **2019-24**, the 2013 HLA only provides programming for 2019/20 (679) so the remainder of the period can be estimated by rolling forward programmed completions from sites within the HLA. This provides for 2,702 units contribution from the existing HLA sites. Therefore, the total current supply available for the 2019-24 period based on best available knowledge of programming is **3381 units**.

Based on the overall **2009-24** period including completions to 2013 and programmed supply to 2024, this provides the following overall supply prior to new LDP sites:

- Total **7717 units** (4336+3381)

Housing Land Shortfall

Based on known requirements and known supply, we can identify the current shortfalls:

2013-19 SESplan Period (10737-4336)	-6401
2019-24 SESplan Period (7250-3381)	-3869
Total Shortfall 2013-24 (17987-7717)	-10270
5 yr Effective Land Supply (8950-3625)	-5325

Based on the above, there is currently just a 2 year Effective Land Supply (40% of requirement) and shortfalls in the SESplan periods of 60% to 2019 and 53% in the period 2019-24, or 57% overall.

Requirements for Proposed LDP

West Lothian have to address the considerable land supply shortfalls identified above if SPP and SESplan obligations are to be met in terms of both the immediate 5 year land supply and also to 2024.

In order to meet these objectives, land capable of early completions must be allocated for housing to provide for the 6,400 unit shortfall to 2019 and 3,900 shortfall from 2019-24.

LDP MIR Settlement Statements - Dechmont (Site Ref.EOI-0166- Main Street)

Site Context

Spatial Strategy

The need to maintain the school roll within Dechmont Primary School is noted and supported. As stated within the Strategy assessment for Dechmont, **“the availability of infrastructure, strategic location, and existing facilities makes the village an attractive option for future development”**.

Preferred and Alternative Housing Sites - Dechmont

The inclusion of Site Ref.EOI-0166- Main Street - as a preferred site for housing is supported. However, the **proposed site capacity is not supported**, as indicated within the development proposals schedule. The site is currently the subject of a planning application which incorporates the site boundary highlighted in red within Figure 3 (i.e. including the preferred site and an area currently within the Dechmont settlement boundary). This application outlines how an approximate capacity of 120 No. units can be comfortably accommodated within the site and this representation seeks to reiterate the justification for this scale.

The committed housing site at Bangour Hospital (Ref.EOI-0034) is noted as a long-standing development aspiration. It is considered that housing can be accommodated within both Bangour and Main Street sites but the on-going delays to development at Bangour due to complex site issues, including significant listed buildings, require a short term housing outlet to address housing need.

The inclusion of a preferred housing site at Burnhouse Road (Ref.PJ-0006) is objected to. As noted hereafter, this site (allocated for 120 units) compares poorly with Main Street and should be deleted from the LDP.

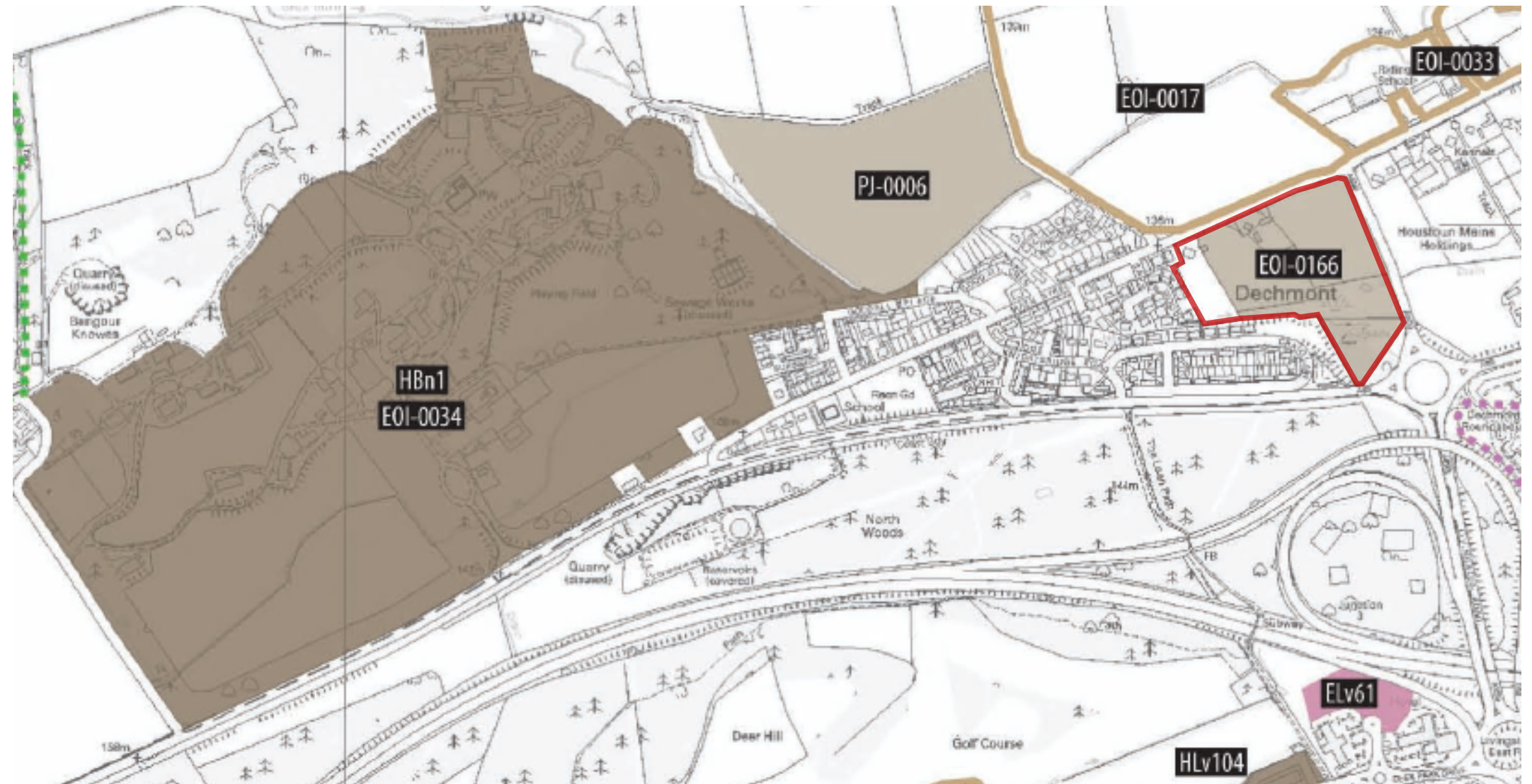


Figure 3 - Overlay of Planning Application Site Boundary on MIR Map 6

LDP MIR Settlement Statements - Dechmont (Site Ref.EOI-0166- Main Street)

Site Overview & Design Proposals

Site Description

The site, as noted within Figure 3, 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.

Current Proposal

The current planning application in principle (August 2014, Ref.0586/P/14) is for residential development with associated landscaping, footpaths and roads. Whilst in principle, a design statement and indicative design proposals demonstrate the scope for approximately 120 units (predominantly housing with a small element of two-storey cottage flats) including 15% on-site affordable provision in line with Council policy, landscaped open space, new woodland planting, SUDS and new path links.

The proposals were outlined at pre-application consultation events in early to mid 2014 which enabled the local community (including Community Council) to have input to the emerging design proposals which supported the application.

The indicative site layout is included within Figure 4 for reference. It should be noted that the eastern woodland boundary was increased significantly following pre-application discussions.



Figure 4 - Indicative Site Layout as contained within Planning Application Ref..0586/P/14

LDP MIR Settlement Statements - Dechmont (Site Ref.EOI-0166- Main Street)

Site Capacity

MIR Strategic Environmental Assessment

The MIR refers to a capacity of 30 units for Main Street. This notional capacity is questioned in terms of its validity with particular regard to the MIR's supporting *Strategic Environmental Assessment* which states 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.”**

Implications of existing Site Capacity

Development on the site is then generally supported in this respect and the eastern boundary of the A899 is established as the natural extent of development. A development of 30 units would either be extremely low density based on the preferred site boundary or requiring a new, artificial defensible eastern boundary and retention of a large area as undefined open space with no functional use or management.

Proposed Site Capacity

The indicative site layout contained within the current 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 number of units also mirrors the allocation at Burnhouse Road referred to hereafter. Therefore, **in general capacity terms, the proposed scale can be accommodated.**

Proposed Site Density

The 120 units are contained within a net developable area of 3.4 hectares (8.4 acres) with the gross site area being 6.2 hectares (15.36 acres). This equates to a **density of 19-35 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 2.8 hectares of amenity open space and landscaping of varying forms, comprising formal parks (c.2950m²), an extensive area on the south-eastern edge including playing field/play area, semi-natural greenspace, SUDS and woodland (c.11,100m²), woodland/landscaped buffers on northern/western edges (c.4,200m²) and a significant woodland buffer on the eastern site edge (c.10,050m²).

Firstly, 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.

Secondly, 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 requested that the site capacity for Main Street is amended to 120 units which would allow for the sustainable use of the whole MIR boundary.

LDP MIR Settlement Statements - Dechmont (Site Ref.EOI-0166- Main Street & Site Ref.PJ-0006 - Burnhouse Road) Comparative Assessment of Dechmont Preferred Housing Sites

Preferred Housing Sites

As noted above, two new preferred housing sites have been introduced by the LDP MIR, being Main Street (Ref.EOI-0166) and Burnhouse Road (Ref.PJ-0006).

Whilst it is considered that, given the substantial housing land supply shortfall, there may be scope to release both sites via the LPD, a comparative assessment provides an opportunity to gauge suitability and deliverability.

Landscape

Both preferred sites are located within the Bathgate Hills Landscape Character Area (LCA), as defined by the *West Lothian Landscape Character Area Classification* (August 2014). Main Street is set within the boundaries of the existing road network and therefore associated with the existing settlement. The site is not subject to any protective landscape designations and the site's capability to absorb development is further detailed within the Landscape and Visual Impact Assessment which supported the planning application.

However, **Burnhouse Road is located within the existing Area of Great Landscape Value within the adopted Local Plan and the Bathgate Hills candidate Special Landscape Area (cSLA)** within the MIR, as detailed within the LDP's supporting *Local Landscape Designation Review* (2013). The landscape context of both sites is highlighted on **Figure 5** on the following page (Page 10) in the context of the most up to date landscape appraisal, i.e. the cSLA identified in the 2013 Review.

At the outset therefore, the Burnhouse Road site is considered to be unsuitable for development on this clear landscape basis.

MIR Site Assessment

Table 1 provides a comparison between the sites in terms of criteria utilised by the Council in the *site-specific Strategic Environmental Assessment (SEA)* of each site contained within the MIR. Additionally, a comparison between Site Capacity, SEA & Consultation Responses comments and Transport Appraisal is included.

As highlighted, in terms of **Site Capacity**, there is **no justification** in MIR for respective capacities whilst the comments indicate Main Street presents a more defensible site within landscape.

In terms of **Transport**, Main Street outscores Burnhouse Road 28-22 with local road issues on the latter site due to the adjoining country-road character.

In terms of **SEA Criteria**, positive ratings for Burnhouse Road for Air Quality, Biodiversity, Climatic (Flood Risk), Cultural Heritage and Water should all be negative based on actual position (notes in red) and there is no justification for difference in site assessments for a number of issues. The SEA/ Consultation Responses comments also highlight other concerns such as the clear **flood risk at Burnhouse Road**.

It is considered that there is a strong case for Main Street being a more suitable site than Burnhouse Road. Negative assessments for Main Street can all be addressed through design which is not the case with Burnhouse Road given its location within a protected landscape area, detachment from the settlement, inadequate adjoining road and fluvial flood risk.

Assessment Criteria	Main Street (Ref.EOI-0166) <i>(Clarendon comment in brackets)</i>	Burnhouse Road (Ref.PJ-0006) <i>(Clarendon comment in brackets)</i>
Site Capacity	30 <i>(no evidence in MIR to justify smaller figure than Clarendon's representation set out)</i>	120 <i>(no representation to Call for Sites exercise – justification to be clarified)</i>
SEA Summary & Consultation Responses Site Assessment	“the land between the edge of the Dechmont settlement envelope and the A899 represents a logical area for the village to extend into, with the A899 providing a clear defensible boundary which could be further re-enforced with judicious tree planting”	“a significant part of this site is at serious risk of flooding” “the site does not relate overly to Dechmont to the south and would not be seen as an obvious extension” “site could be developed, but would require sensitive integration into the landscape”
SEA - Air Quality	Negative – re distance to public transport & jobs/services <i>(adjacent bus service, nearby rail, Livingston closeby)</i>	Positive <i>(how is this different to Main Street - not on main bus route)</i>
SEA - Biodiversity	Part Negative – re habitat impact <i>(proposals retain woodland and avoid SE area)</i>	Positive <i>(site adjoins watercourse with equal or greater scope for habitat)</i>
SEA - Climatic Factors	Negative – re energy consumption & flood risk <i>(flood risk allowed for within proposed site layout)</i>	Positive <i>(site adjoins watercourse with SEPA Flood Map showing flood risk)</i>
SEA - Cultural Heritage	Positive	Positive <i>(site adjoins Bangour Conservation Area with potential impact)</i>
SEA - Landscape & Townscape	Part Negative – re conspicuous location <i>(site is bound by trees on 3 sides)</i>	Part Negative – re conspicuous location & protected landscape <i>(site is within Area of Great Landscape Value in adopted Local Plan and within Special Landscape Area in LDP MIR – site is also part of open countryside with no strong boundary to north)</i>
SEA - Material Assets	Negative – re coalescence/settlement identity & greenfield land <i>(site will not join Dechmont and Uphall and has strong eastern boundary to be augmented)</i>	Part Negative – re greenfield land <i>(site should be rated negative for impact on settlement identity as it extends north into open countryside)</i>
SEA - Population & Health	Positive	Positive
SEA - Soil	Negative – re prime agricultural land <i>(site not actively farmed – Class 2 land designation covers wide area including other non-farmed areas including adjoining golf courses)</i>	Negative – re prime agricultural land <i>(site is currently farmed, i.e. active agricultural land)</i>
SEA - Water	Positive	Positive <i>(site adjoins watercourse with SEPA Flood Map showing flood risk)</i>

Table 1- MIR Site Assessment Comparison

LDP MIR Settlement Statements - Dechmont (Site Ref.EOI-0166- Main Street & Site Ref.PJ-0006 - Burnhouse Road)
 Comparative Assessment of Dechmont Preferred Housing Sites

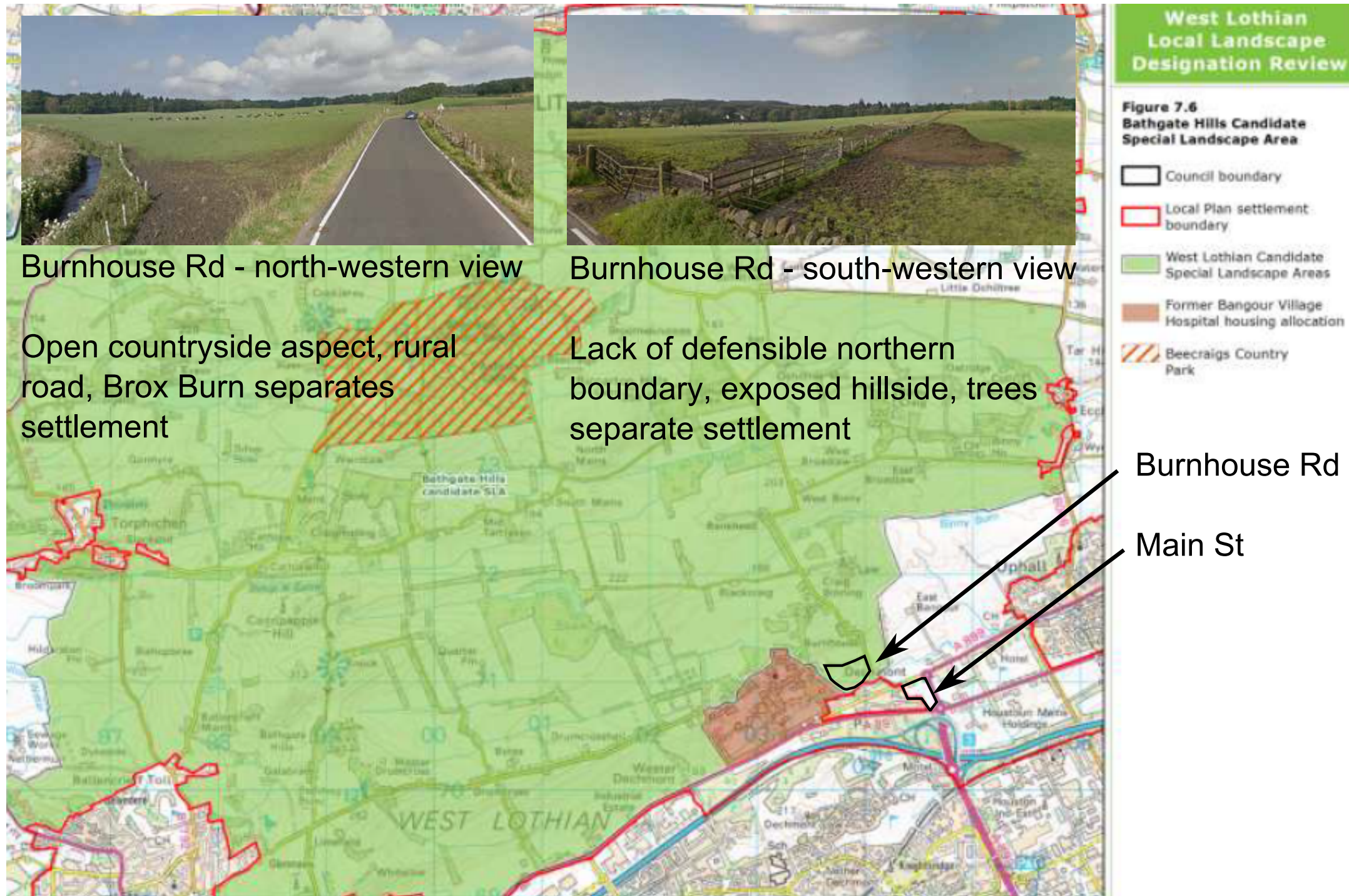


Figure 5 - Landscape Context of Main Street and Burnhouse Road Sites - base plan shows designated Special Landscape Area (green), images show views over Burnhouse Road site within SLA

Planning Application & Key Studies

As noted above, a planning application in principle was registered by the Council in August 2014. Discussions with West Lothian Council are on-going with respect to this live application.

The Council have intimated a general support for the site based upon its inclusion within the LDP MIR as a preferred housing opportunity, subject to agreement on scale.

As part of the application submission, a full suite of supporting studies were provided, including;

- Landscape & Visual Impact Assessment (Clarendon)
- Stage I Habitat Survey (Nigel Rudd Ecology)
- Flood Risk Assessment (Kaya Consulting)
- Transport Assessment (Modus)
- Stage I Archaeological Assessment (AOC)
- Desktop Ground & Services Study (RFBP)
- Coal Mining Risk Assessment (Mason Evans)
- Education Capacity Appraisal (Clarendon)
- Design Statement & Proposals (Clarendon)

Copies of the above studies are available to the Development Plans team via the Council's planning portal (application ref.0586/P/14).

In this respect, the opportunity to discuss the issues contained within this submission with particular regard to scale would be welcomed by the landowner.

Site Effectiveness Summary

Scottish Planning Policy (SPP) and guidance set out in PAN 2/2010 Affordable Housing and Housing Land Audits require that sites allocated within Local Development Plans are effective, being able to contribute completions during the plan period (up to year 10 from LDP adoption).

As such, PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with **land at Main Street, Dechmont considered effective, being free of potential site constraints and able to deliver units within the plan period.** Specifically:-

Ownership Status: Effective

The site is owned by a willing seller with confirmed interest from national housebuilders seeking to start construction at the earliest opportunity.

Physical Status: Effective

The **Desktop Ground/Services study** and **Coal Mining Risk Assessment** indicates there are no restrictions to the proposed site layout with regard to ground conditions or services. The **FRA/Drainage Strategy** sets out the area to be kept free from development which has been accommodated within the site layout. Surface water drainage options exist to east and south-east of the site. The **Archaeology Assessment** confirms the site is not subject to constraints that would hinder development, subject to further investigations through the detailed planning stage.

Contamination Status: Effective

The site, given its greenfield nature, has been deemed to have a low risk of contamination as indicated within the **Desktop Ground/Services study.**

Deficit Funding Status: Effective

The development would be privately funded, also allowing for required infrastructure upgrades.

Marketability Status: Effective

The wider Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan Housing Needs and Demand Assessment. The proposed site could provide **significant completions within the pre-2019 SESplan period.** Based upon the proposed capacity of 120 units, a site start in Spring/Summer 2015 and a build rate of 36 units per annum, the **site could be completed within pre-2019 timescales.**

Infrastructure Status: Effective

Utility connections and water and drainage connections are available to the site with any localised upgrading of capacity able to be met by the developer.

The **Transport Assessment** confirms that the scale of development can be accommodated within the local road network and access proposals and associated sightlines are achievable. **The site is thus fully deliverable and effective in terms of transport considerations.**

The **Education Capacity Appraisal** outlines a proposed strategy to accommodate development. In this regard, generated pupil demand can be accommodated within Broxburn Academy and the established approach of financial contributions towards future extensions for St.Margaret's Academy and St.Nicholas' can address the minimal impact on RC schools.

In terms of Primary provision, a short term solution of utilising spare capacity within the Dechmont Infant School along with Uphall and Kirkhill Primary Schools can meet initial demand. Medium term, financial contributions towards a new Dechmont Primary School (either redevelopment of existing site or new building on Bangour site) can meet future capacity requirements.

Further discussion with West Lothian Council is welcomed with regard to the education capacity strategy. It is noted that the MIR site assessment highlights development benefits of supporting the falling school roll at Dechmont Infant School.

Land Use Status: Effective

Housing (both private and affordable) is the predominant proposed use for the site.

Overall

There are no known constraints which will hinder delivery of housing completions within the LDP period.

The site allows for a well defined extension of Dechmont which can integrate well with the existing urban area and have no adverse landscape impact.

The landowners have submitted a planning application and undertaken supporting studies which demonstrate site deliverability in the short term. A viable education capacity strategy has been presented as part of the planning application submission.

The site is capable of making a significant contribution to West Lothian's housing land supply shortfall within the pre-2019 period.

The site is assessed as being superior to the other MIR preferred site within Dechmont (Burnhouse Road) in terms of landscape, transport, urban design and technical constraints. The Burnhouse Road site should be deleted and capacity transferred to Main Street.

It has been demonstrated that the proposed site capacity at Main Street (120 units) is suitable, contextual and achievable. The site capacity should therefore be amended to 120 units within the Proposed LDP.

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