

The Director of Planning  
City of Edinburgh Council  
Market Street  
Edinburgh

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**15 October 2014**

Dear Sir,

**WEST LOTHIAN LOCAL DEVELOPMENT PLAN: LAND AT HOUSTON HOLDINGS,  
UPHALL, WEST LOTHIAN (LATE-0010)**

RFA wishes to make a representation to the West Lothian Local Development Plan (MIR) on behalf of Folio Developments in respect of land at Houston Holdings, Uphall, West Lothian.

The subject site has been subject to previous representations to the MIR as part of a planned approach. A formal letter of support has been submitted to the Proposed LDP identifying planning reasons for inclusion of the land as a predominantly mixed use opportunity which is not predominantly housing led but could contain an element of residential use.

Our client fundamentally disagrees with the approach being taken to this location along the A89 and wishes to submit a formal objection to the LDP. We do not accept the Council's logic or reasons for excluding this site and should the site not be progressed in the Proposed LDP would wish to be represented at the LDP Examination / Hearings.

*Development Context*

The site is situated between the A89 to the north, Station Road to the east and Dobbies Garden Centre at Dechmont Roundabout to the east. The land is immediately north of the M8 and land owned by the Muir Group and allocated for Class 4 and 5 development at

Beuch Burn and opposite Uphall Golf Club. It is the remaining land along the A89 which is the residue of previous allocations and planning decisions made in this location and is no longer defensible in its current designation.

The site forms potentially valuable development land and should be included in the urban envelope for mixed use development (commercial and leisure) within the Proposed Plan. Whether housing is accommodated on site will depend on the scale of commercial – leisure use and whether there remains a perceived shortage for market or specialist housing provision.

The land comprises of 21.2 Ha of ex Department of Agriculture Small Holdings which now accommodate a mix of residential plots, retail and leisure uses, as well as business workshops and other non conforming uses. It is disparate in character and greatly under utilised in what is a strategic location within the West Lothian Growth Corridor as designated by SESPlan.

In terms of the West Lothian Local Plan the land in question is currently designated as “Countryside Belt,” and currently precludes built development on the land. Our client would request that this designation is fully and properly reviewed as part of the emerging LDP and in the light of shortages in the supply of effective, marketable, mixed use sites.

The proposed LDP has an emphasis on brown field land within Core Development Areas. However not all land can be found within these areas and this approach is actually constraining development opportunities in West Lothian. Furthermore the approach taken will leave West Lothian with a gross undersupply of mixed use commercial and leisure opportunities in order to support housing development and re-generation. Previous studies to determine such uses are now out of date and unreliable as a basis for underpinning the new LDP.

### *Development Potential*

Proposed development would be maintained within defensible boundaries and accommodate mixed use buildings on the core site at Dechmont Roundabout which is now a major nodal point at this accessible location. This makes it highly marketable for a range of uses and will attract investment and economic development into the West Lothian area.

Development in this area would not result in urban sprawl or coalescence; indeed the overall corridor would be greener through enhanced structure planting. The land would be retained for leisure and commercial uses in recognition that there is already a major user (Dobbies) on site.

The site is in a highly sustainable location, given its proximity to Uphall Railway Station and accessibility to key public transport routes between Livingston and Edinburgh. The success of Dobbies Garden Centre has made this location a key magnet and provided a market for a range of associated commercial and leisure uses in preference to other locations being promoted which would create a dispersed pattern which would be desirable in planning and access terms.

In environmental terms, the proposed development would have minimal effect on the landscape and the visual impact would be beneficial in terms of integrating development. Sustainability and economical development benefits significantly outweigh any environmental issues on this land.

There is a large number of extant planning applications in the area which, if implemented, would create an untidy configuration of piecemeal developments with adverse effects on the visual and landscape character from the A89 and M8 motorway. The proposition being made is for a more co-ordinated development and attractive urban layout which creates a distinctive place and location in accordance with current design policies.

In terms of effectiveness we are not aware of any ownership, physical, financial or marketing constraints that would preclude this site from coming forward in the short-medium term and form part of the 5 year land supply. Infrastructure and services are available to support the development of the land.

Developer contributions will be negotiated with the Council in respect of any agreed uses for Education, Transport, Affordable Housing and Community Contributions in accordance with Supplementary Guidance and through Section 75 Agreements and Planning Obligations.

In accordance with the Town and Country Planning (Scotland) Act 1997 (as amended) any application coming forward for the site will need to be determined in accordance with the development plan unless material considerations indicated otherwise.

We believe that there are very strong material arguments which would give significant weight to any application coming forward in the future. These would include:

- Scottish Planning Policy;
- SESplan;
- Emerging Local Development Plan
- Planning Advice Notes

In particular SPP seeks to promote sustainable economic development. It also seeks to increase the supply of housing to maintain a 5 year supply of effective housing land at all times as part of a generous supply for house builders. It also acknowledged that some development will need to take place on green field land adjacent to existing settlements.

### *Conclusions*

The site is greatly under utilised in what is a strategic location within the West Lothian Growth Corridor as designated by SESPlan. The proposed development would have minimal effect on the landscape and the visual impact would be beneficial in terms of integrating development into the urban fringe.

It is a highly accessible and sustainable location which is not physically constrained. We do not accept that the objections raised by Historic Scotland or BAA cannot be mitigated by layout and design.

The proposals create a more co-ordinated development and attractive urban layout which creates a distinctive place and location in accordance with current design policies. In addition there is significant betterment and socio-economic benefits which will attract employment to this corridor.

The success of Dobbies Garden Centre has made this location a key magnet and provided a market for a range of associated commercial and leisure uses in preference to other locations being promoted which would create a dispersed pattern which would be desirable in planning and access terms.

In cognisance of the above we wish to maintain our objection to the MIR. If the site does not form part of the Proposed LDP my client would wish to be represented at the Local Plan Examination Hearing dealing with this matter.

We look forward to hearing from you further in this regard in due course.

Yours,

Rick Finc, MRTPI, MIED, Principal