The Development Planning & Environmental Manager West Lothian Civic Centre Howden South Road Livingston West Lothian EH546FF



15 November 2015

Dear Sirs,

West Lothian Local Development Plan - Representation

This Representation to the proposed subject Plan relates to the designation of the Area referenced as H-LL-11 and in particular to the section within the same, bounded by the Union Canal to the south & by the Edinburgh to Glasgow main railway line to the north – known as Wilcoxholm Farm

For reference, I am a resident i west.



which adjoins the proposed subject section immediately to the

While there are several other grounds in relation to social, environmental etc which might merit comments, this Representation is to particularly highlight the following:-

- Flooding
- Access
- Suitability for development.
- Land Ownership

Looking at these in turn:-

FLOODING

Reference to SEPA Flood map for Linlithgow identifies the north-west area of H-LL-11 as a "High risk" area for surface water flooding. There is physical evidence of the same for a good proportion of the year and recorded problems with flooding events in adjacent areas.

The topography of the proposed area is steeply falling from south to north – from an elevated canal embankment to the rail embankment to the south.

Access

The Plan does not identify any access arrangements to the Wilcoxholm Farm section. The P-102 "other development" does not seem to be identified in the schedules.

The only current access to the land is via a narrow lane off the entrance to the second secul-de-sac. There is also direct farm access from the Wilcoxholm farm to the east but with no direct connection to the public road network.

Neither of these existing routes look to be able to be developed to meet current highway and road design requirements.

Alternatives would most likely require bridging of the Union Canal to link the Pilgrims' Hill section to the Wilcoxholm Farm section from the B9080 Edinburgh Road. The extent of the proposed development may necessitate 2 No such crossings as a minimum to meet emergency services requirements given also the additional risks due to the proximity of the railway and the elevated Union Canal.

Suitability for Development

The Plan itself identifies numerous reasons (page 199 refers) why this Area is far from suitable for development, viz:-

- Contrary to the current "Area of Restraint" policy applicable to development in Linlithgow
- The Area is a green field site and as such should be last resort option for development consideration in accordance with current Council policies.
- There are (as reinforced above) SEPA concerns in relation to Flooding
- The Area is located over old mine workings
- The Site is within the safeguarding zone associated with Edinburgh Airport.

One wonders why, in the light of the observations noted, this Area is proposed for development in the first place.

Land Ownership

Area H-LL-11 is not recorded as being owned by the Planning Authority. It is noted that the Area was subject of EOI -0114 in 2011.

The Union Canal bisects the designated Area, has there been any consultation with Scottish Canals on the proposals?

Yours faithfully,	
Michael McGuire	