

19 November 2015

Development Planning and Environment Manager  
West Lothian Council  
West Lothian Civic Centre  
Howden South Road  
LIVINGSTON  
West Lothian  
EH54 6FF

Dear Sir

### **WLC - LOCAL DEVELOPMENT PLAN CONSULTATION RESPONSE**

I have been a resident of Linlithgow since 1987. I run my own consultancy business from Linlithgow – I am a Chartered Surveyor. I have been a supporter of many of the voluntary civic groups and other initiatives within Linlithgow over the years.

The views expressed here are my own personal views.

I wish to object to the Local Development Plan (LDP) as it refers to the settlement of Linlithgow and Linlithgow Bridge (L&LB) for the following reasons, all of which are interlinked:

#### Reason 1 – Lack of a co-ordinated development plan

The policies and proposals in the LDP do not constitute a co-ordinated development plan for L&LB. There appears to be a complete lack of strategic, “joined up” thinking. In essence it does a great disservice to the L&LB.

The LDP neither considers the medium to long term needs of the area, nor does it examine how they may be provided during the 10 year period of the LDP.

The main financial asset of the L&LB is the value of developable land and yet the LDP only seems to identify those areas of land, where there is already interest by developers to build housing.

As a result the LDP is largely reactive in its approach and only panders to the commercial interests of a limited number of housing developers. Rather than identifying the real needs, working out a ‘master plan’, and requiring developers to contribute to the necessary infrastructure in advance via legally binding agreements (e.g. Section 75 Agreements), the LDP leaves that infrastructure to be funded through the planning application procedure, and ultimately the vagaries of the planning appeal process (as has very often been the case in recent years).

There needs to be a comprehensive master plan for the area which includes all relative issues and a commitment to a phased programme of development, sufficient to finance the necessary infrastructure.

The Linlithgow Planning Forum (LPF), has produced a document entitled '*Linlithgow - A Plan for the Future 2015-30*'. The LPF Plan is by no means perfect, but it seeks to address the issues head-on, and identifies potential solutions. It takes a much more holistic and long term approach than the current version of the LDP. It is only by adopting such a co-ordinated plan for L&LB that development and the provision of the necessary infrastructure can best be achieved. The two must go hand in hand – infrastructure and development, and ideally in that order.

### Reason 2 – The High Street

Anyone who has spent even a modest amount of time in the centre of Linlithgow will have come to realise the chronic traffic congestion problem that we experience. This problem is not limited to peak times. It can happen at any time.

The problem results in air pollution which is one of the worst in West Lothian. It also results in a poor service for all road users, pedestrians, cyclists and drivers as well as public transport, emergency service and delivery vehicles.

The problem has a consequence in terms of health and safety, the environment and business, and the quality of life for residents, and reduces the performance and attractiveness of the High Street as a retail area, a business area, and a destination for tourists.

The argument for a co-ordinated strategic development plan, particularly applies to the transport infrastructure issues, and yet the LDP does not address this issue in any significant way. The LDP appears to be limited to minor mitigating measures at selected road junctions.

The only proposal of any significance that will help relieve the pressure on the High Street is the upgrading of the M9/A803 (Burghmuir) interchange to form an all-ways junction by the addition of west facing slip roads. This has been talked about since I moved to Linlithgow in late 1980s. It is such an obvious quick fix, and yet, even still, there are no means indicated in the LDP as to how this will be financed let alone delivered, which really means that it is very unlikely to happen in the life of the proposed LDP as matters stand.

A bolder, more strategic approach is required, with new distributor roads constructed to service areas zoned for housing development (e.g. around the south east quarter), and consideration of a specific High Street relief road, constructed to the north of the current M9 corridor. All of this, with the addition of the upgrading of the M9/A803 interchange, will assist greatly in taking traffic away from the High Street.

### Reason 3 – Car parking

Linlithgow is very fortunate to have a railway station (soon to be upgraded) which provides excellent access to main line services particularly between Glasgow and Edinburgh, and provides a very viable alternative to the car.

However, long stay car parking adjacent to the station is very limited, resulting in overflow all day commuter parking in what should be short stay spaces. The problem migrates to the surrounding residential areas close to the station too (I know because I live in one) where all day commuter parking creates an unpleasant environment, creates a health and safety risk,

and generates considerable peak time traffic in what are (or should be) quiet residential areas. The chronic shortage of long stay car parking also results in a limit to the spaces that could be used by tourists, shoppers and other business visitors.

With the ongoing plan to electrify the Glasgow – Edinburgh line and the anticipated increase in service frequency, and increased passenger numbers, then this problem is only going to get considerably worse over the next few years.

The LDP fails to address these car parking issues and how these affect retail, tourism and the business attractiveness of the town, and the environment of those residential areas close to the centre of town.

Mitigating measures such as the control of existing parking and the provision of new parking by developers should form part of a co-ordinated plan.

#### Reason 4 – Education needs of the town

A co-ordinated, joined up development plan is needed if the close link between education and housing is to be addressed properly and without creating acute pressure and legacy issues.

The LDP needs to identify and address the future demand for primary and secondary school education and this must be related to land allocated for housing development, on the basis that the developer would finance and make provision for the future educational needs, not just of their development in isolation, but of the LDP as a whole. The piecemeal approach to the relationship between housing and education in the town that has hitherto been the norm has not been fit for purpose for a good many years and needs to be addressed.

In conclusion, the proposed LDP, does not address the long term needs of Linlithgow and Linlithgow Bridge. It appears to be a plan drawn up as a reaction to the wish list of housing developers and fails to tackle some of the chronic problems that the residents, businesses and visitors to the town experience on a day to day basis.

It fails to show any sort of joined up strategic thinking to embrace, stimulate and encourage the sustainable growth of the town.

For these reasons, I object to the Local Development Plan and request that West Lothian Council make amendments to the Plan in line with the proposals detailed in the Linlithgow Planning Forum's document '*Linlithgow, A Plan for the Future 2015-30*'.

Yours faithfully



**Allan M Robertson**

