

16 November 2015

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

Dear Sir,

West Lothian Council - Local Development Plan Consultation Response.

This is the response of Linlithgow Civic Trust (LCT) who wish to object to the Local Development Plan (LDP) as it refers to the settlement of Linlithgow and Linlithgow Bridge (the Settlement area) for the following reasons:

The policies and proposals in the LDP do not constitute a co-ordinated development plan for the settlement area in that they do not consider the needs of the area and examine how they may be provided during the 10 year period of the LDP. The main financial asset of the settlement area is the value of developable land and yet the settlement boundary in the LDP has been determined only on the basis of extending the existing boundary to include those areas of land, notably at Clarendon Farm (H-LL 10) and Preston Farm (H-LL12), where there is current interest by developers to build housing. As a result the impact of the development areas are dealt with in a reactive way and leave the requirement for developers to contribute to infrastructure to be achieved through the planning application procedure rather than by providing a proactive plan of proposals (a master plan) to which developers would be required to contribute via legal agreement through planning legislation. In almost all cases to leave contributions to the development control stage is too late since land values have by then been established and the developer has no room for manoeuvre which almost always results in appeal against such conditions. The settlement boundary therefore needs to be determined by a comprehensive master plan for the settlement area which includes all relative issues and a phased development sufficient to finance the necessary infrastructure.

The LCT, through its representation on the Linlithgow Planning Forum, has contributed to the document 'Linlithgow A Plan for the Future 2015-30' and it is by adopting such a co-ordinated plan for the settlement area that the LCT consider that development and the provision of the necessary infrastructure can best be achieved.

More specifically, with regard to the LDP proposals which designate land for housing, the LCT would wish to object to the site H-LL12, Preston Farm, because of its incursion into a designated 'Area of Great Landscape Value', its distance from services in the town centre and because its development in isolation would not assist with the provision of infrastructure benefits detailed in the Planning Forum's 'Plan for the Future'.

The argument, of co-ordinated development, particularly applies to the Transport infrastructure issue covered by TRAN1 to TRAN5 inclusive and paragraphs 5.66, 5.241, page 35 and the Supplementary Guidance Transport appraisal of the LDP. Linlithgow High Street currently experiences traffic congestion problems resulting in a poor quality of service for all road users, pedestrians, cyclists and drivers as well as public transport, emergency service and delivery vehicles. This reduces the performance and attractiveness of the High Street as a retail area, a business area, and a destination for tourists and results in air pollution which is one of the worst in West Lothian.

This has a cost consequence in terms of health and safety, the environment and business and the quality of life for residents. Yet the LDP Transport appraisal does not address this issue but is restricted to consider minor mitigating measures for junctions on the High Street and Falkirk Road for traffic generated by a very restricted number of housing sites and then only considers these during the morning peak hour and using a model which in itself restricts the traffic feeding onto the test network. The only relief to the high street proposed is the upgrading of the M9/A803 (Burghmuir) interchange to form an all-ways junction by the addition of west slip roads. No indication is given in the LDP as to how this may be financed, for example by the commercial development of the Burghmuir area or by the provision of a motorway service area with hotel.

The same argument of planning for development of a scale necessary to provide for needed infrastructure applies to the close link between education and housing. With reference to paragraphs HOU4 of the LDP the future demand for primary and secondary school education should be related to land allocated for housing development such that the future developer would finance and make provision for the future educational needs.

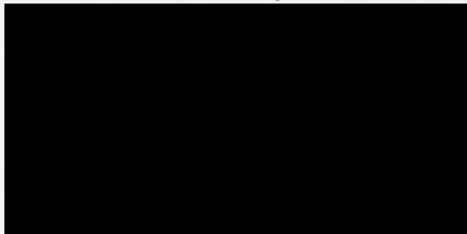
Similarly the economic and employment needs of the settlement area are closely associated with infrastructure capacity, EMP6, 8 and 9 refer. Linlithgow is fortunate to have a railway station which provides excellent access as an alternative to the car but parking adjacent to the station is very limited and overflow commuter parking occupies spaces all day which could be used by tourists, shoppers and other business visitors. The LDP fails to address these car parking issues and how

these affect retail, tourism and the business attractiveness of the town nor does it consider how 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.

In conclusion, unless the LDP, which can be considered a master plan for the development of the settlement area of Linlithgow and Linlithgow Bridge for the next 10 years, can produce proactive and co-ordinated development proposals, financed by the development in a phased way, it is unlikely that land prices will reflect the developers responsibilities, each site will be treated in isolation and the LDP will fail to address problem issues.

For these reasons the Linlithgow Civic Trust objects to the Local Development Plan and requests West Lothian Council to 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 sincerely,



Chris Long
Chairman
Linlithgow Civic Trust