



*Have your say on the
West Lothian Local Development Plan Proposed Plan
Consultation Response Form*

West Lothian Council has published its *Proposed Plan* together with supporting documents including an *Environmental Report (SEA)*, *Habitats Regulation Appraisal*, *Strategic Flood Risk Assessment* and *Equalities & Human Rights Impact Assessment*. These can be viewed on the West Lothian Council website at <http://www.westlothian.gov.uk/proposedplan>

If you wish to make representations on the *Proposed Plan* or associated documents, you are encouraged to use the online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the *Local Development Plan* and ask for it to be logged and directed to the Development Planning and Environment Team. Someone will contact you. Alternatively you can email us at wlldp@westlothian.gov.uk We will endeavour to respond as quickly as possible but in any event within three working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

Data Protection Statement

Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name and postal address but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).

We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination of the Proposed Plan to discuss your representation. Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.

FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning etc (Scotland) Act 2006 and what documents will accompany the plan i.e. the Action Programme etc.

VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

- **Economic Development and Growth** (page 12, paragraphs 5.11-5.22)
- **Flexibility within traditional industrial estates** (page 14, paragraphs 5.24-5.25)
- **Enterprise Areas** (page 17, paragraphs 5.24-5.25)
- **Local business opportunities, small business start-ups and working from home** (page 17, paragraph 5.26)
- **Tourism** (page 17, paragraphs 5.27-5.28)
- **Promoting community regeneration** (page 19, paragraphs 5.29-5.35)
- **Housing land requirements for the LDP** (page 20, paragraphs 5.36-5.49)
- **Effective Housing Land and Generous Supply** (page 23, paragraphs 5.50-5.53)
- **New Housing Sites and Design** (page 24, paragraphs 5.4-5.56)
- **Strategic Allocations (including previously identified Core Development Area Allocations)** (page 25, paragraphs 5.57-5.61)
- **Whitburn/Charette** (page 26, paragraph 5.62)
- **Linlithgow and Linlithgow Bridge** (page 26-27)
- **Deans South, Livingston; Area for Comprehensive Re-development** (page 27, paragraph 5.68)
- **Affordable Housing** (page 27, paragraphs 5.69-5.74)
- **Accommodation for Gypsies, Travellers and Travelling Show People** (page 29, paragraph 5.75)
- **Residential Care and Supported Accommodation** (page 29, paragraphs 5.76-5.77)
- **Infrastructure Requirements and Delivery** (page 30, paragraphs 5.78-5.84)
- **Providing for Community Needs** (page 32, paragraphs 5.85-5.88)
- **Education** (page 32, paragraphs 5.89-5.92)
- **Healthcare Provision** (page 33, paragraphs 5.93-5.96)
- **Sports Facilities** (page 33, paragraphs 5.97-5.101)
- **Green Infrastructure and Green Networks** (page 34, paragraphs 5.102-5.105)
- **Water and Drainage** (page 34, paragraphs 5.106-5.107)
- **Travel in and around West Lothian** (page 34, paragraphs 5.108-5.112)
- **Roads** (page 35, paragraph 5.113)

- **A71 Corridor** (page 35, paragraphs 5.114-5.115)
- **A801 Corridor** (page 35, paragraphs 5.116-5.117)
- **A89/A8** (page 35, paragraphs 5.118-5.126)
- **Rail** (page 37, paragraphs 5.127-5.130)
- **Walking and Cycling** (page 37, paragraphs 5.131-5.132)
- **Town Centres and Retailing** (page 39, paragraphs 5.133-5.138)
- **Landscape Character and Local Landscape Designations** (page 41, paragraphs 5.139-5.143)
- **Countryside Belts** (page 42, paragraph 5.144)
- **Development in the Countryside** (page 42, paragraphs 5.145-5.147)
- **Lowland Crofting** (page 44, paragraphs 5.148-5.152)
- **Green Networks, Local Biodiversity Sites and Geodiversity Sites** (page 45, paragraphs 5.153-5.155)
- **Forestry** (page 46, paragraphs 5.156-5.163)
- **Union Canal** (p.49 paragraphs 5.164-5.165)
- **Pentland Hills Regional Park** (page 49, paragraphs 5.164-5.165)
- **Country Parks** (page 50, paragraph 5.169)
- **Allotments/Community Growing** (page 51, paragraphs 5.170-5.171)
- **Temporary/Advance Greening** (page 51, paragraphs 5.172-5.174)
- **Biodiversity** (page 52, paragraphs 5.175-5.180)
- **Geodiversity** (page 53, paragraph 5.181)
- **West Lothian Open Space Strategy** (page 53, paragraphs 5.182-5.184)
- **Historic and Cultural Environment** (page 54, paragraphs 5.185-5.187)
- **Conservation Areas** (page 55, paragraphs 5.185-5.188)
- **Former Bangour Village Hospital, Dechmont** (page 56, paragraph 5.189)
- **Conservation Area at Abercorn/Hopetoun Estate** (page 56, paragraph 5.190)
- **Other Areas of Built Heritage and Townscape Value** (page 57, paragraphs 5.191-5.199)
- **Listed Buildings** (page 58, paragraphs 5.185-5.187)
- **Historic Gardens and Designed Landscapes** (page 59, paragraphs 5.200-5.201)
- **Historic Battlefields** (page 60, paragraph 5.202)
- **Archaeology** (page 60, paragraph 5.203)
- **Scheduled Monuments** (page 60, paragraphs 5.204-5.206)
- **Public Art** (page 61, paragraphs 5.207-5.208)
- **Climate Change Measures** (page 62, paragraphs 5.209-5.214)
- **Low Carbon Development and Renewable Energy** (page 63, paragraphs 5.215-5.221)
- **Wind Farms and Wind Turbines** (page 65, paragraphs 5.222-5.225)
- **Energy and Heat Networks** (page 66, paragraphs 5.226-5.229)
- **Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing** (page 67, paragraphs 5.230-5.232)
- **The Water Environment and Flood Risk Management** (page 67, paragraphs 5.233-5.239)
- **Air Quality and Noise** (page 70, paragraphs 5.240-5.242)
- **Edinburgh Airport** (page 71, paragraph 5.243)
- **Noise** (page 71, paragraph 5.244)
- **Contaminated Land** (page 71, paragraphs 5.245-5.246)
- **Vacant and Derelict Land** (page 72, paragraphs 5.249-5.250)
- **Minerals and Waste** (page 73, paragraphs 5.251-5.256)
- **Site Restoration** (page 75, paragraphs 5.257-5.238)
- **Unconventional Gas Extraction including Hydraulic Fracking** (page 75, paragraph 5.259)
- **Waste** (page 76, paragraph 5.260)

DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

- **Addiewell & Loganlea** (page 79)
- **Armadale** (page 80)
- **Bathgate** (page 81)
- **Blackburn** (page 82)
- **Blackridge** (page 83)
- **Breich** (page 83)
- **Bridgehouse & Bridgecastle** (page 83)
- **Bridgend** (page 83)
- **Broxburn** (page 84)
- **Burnside** (page 84)
- **Dechmont & Bangour** (page 85)
- **East Calder** (page 85)
- **East Whitburn** (page 86)
- **Ecclesmachan** (page 86)
- **Fauldhouse** (page 86)
- **Greenrigg** (page 86)
- **Kirknewton** (page 87)
- **Landward area** (page 87)
- **Linlithgow & Linlithgow Bridge** (page 89)
- **Livingston** (page 90)
- **Longridge** (page 93)
- **Mid Calder** (page 93)
- **Newton and Woodend** (page 93)
- **Philpstoun/East & West Philpstoun/Old Philpstoun** (page 93)
- **Polbeth** (page 93)
- **Pumpherstoun** (page 93)
- **Seafield** (page 93)
- **Stoneyburn/Bents** (page 94)
- **Threemiletown** (page 94)
- **Torphichen** (page 94)
- **Uphall** (page 94)
- **Uphall Station** (page 94)
- **West Calder & Harburn** (page 95)
- **Westfield** (page 95)
- **Whitburn** (page 96)
- **Wilkieston** (page 97)
- **Winchburgh** (page 97)

APPENDICES (page 99)

A number of appendices are included at the end of the LDP which provides additional detail on specific elements of the Proposed Plan.

- **Appendix 1 – Employment Land Allocations** (page 99)
- **Appendix 2 – Schedule of Housing Sites / Site Delivery Requirements** (page 119)
- **Appendix 3 – Schedule of Land Ownership** (page 259)
- **Appendix 4 – LDP Supplementary Guidance (SG) and Planning Guidance (PG)** (page 265)
- **Appendix 5 – List of Policies** (page 273)
- **Appendix 6 – List of Proposals** (page 275)

GLOSSARY (page 280)

An explanation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

- **Strategic Environmental Assessment (SEA) Environmental Report.**
- **Equalities & Human Rights Impact Assessment (EQHRIA).**
- **Strategic Flood Risk Assessment (SFRA).**
- **Habitats Regulations Appraisal.**
- **Transport Appraisal (TA).**
- **Action Programme.**

ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

Thank you for your participation and contribution.

Your details (mandatory)

Please indicate in what capacity you are making this submission:

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information:

Name

Email

Telephone

Address

Organisation name

Client's name

Is this the first time you have made a written representation on the Proposed Plan? (mandatory)

- Yes
- No

If you have previously submitted a site to be considered for development when the council was initially seeking Expressions of Interest (EOI), or commented on the Local Development Plan at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you.

Enter EOI (Expression of Interest) reference here

Enter MIRQ (Main Issues Report) reference here

Once form has been completed please sign and date (mandatory)

You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you.

Signature Date

FOR OFFICE USE ONLY

Proposed Plan reference

Please use this form for sections: Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendices; Glossary; Proposal Maps; Strategic Environmental Assessment (SEA) Environmental Report; Equalities and Human Rights Impact Assessment (EQHRIA); Strategic Flood Risk Assessment (SFRA); Habitats Regulations Appraisal; Transport Appraisal (TA); and Action Programme.

Section title	<input type="text"/>	
Page nos.	<input type="text"/>	Paragraph nos. <input type="text"/>
<div style="border: 1px solid black; height: 300px; width: 100%;"></div>		

Section title	<input type="text"/>	
Page nos.	<input type="text"/>	Paragraph nos. <input type="text"/>
<div style="border: 1px solid black; height: 300px; width: 100%;"></div>		

Please use this form for sections: The Spatial Strategy and Development by Settlement

Settlement	LINLITHGOW		
Site address / location	ORACLE, BLACKNESS ROAD, LINLITHGOW		
Site Ref	N/A	Page nos.	

PLEASE REFER TO ATTACHED LETTER

Settlement	LINLITHGOW		
Site address / location	HOUSING ALLOCATIONS H-LL1 - H-LL12		
Site Ref	H-LL1 - H-LL12	Page nos.	89

PLEASE REFER TO ATTACHED LETTER

Additional comments

Please use this space to add any additional comments which have not been covered elsewhere in this questionnaire.

A large, empty rectangular box with a thin black border, intended for providing additional comments.

20 November 2015

West Lothian Council
Civic Centre
Howden South Road
Livingston
West Lothian
EH54 6FF

Our Ref: GL/SS/20112015

By Email: wldp@westlothian.gov.uk

FAO: Ms Fiona McBrierty

Dear Sir / Madam,

West Lothian Local Development Plan (LDP: Proposed Plan

Representation Submitted on Behalf of Oracle UK In Respect of Land at Blackness Road, Linlithgow

The following representation is submitted on behalf of Oracle UK and objects to the failure of the Proposed LDP to allocate the existing Oracle site at Blackness Road, Linlithgow as a mixed use development opportunity with support for business uses and residential development.

Oracle, Blackness Road, Linlithgow

As explained in our MIR submission, Oracle is fully committed to the Blackness Road site, however the nature of our client's business has changed and their business has moved away from manufacturing and distribution and is now focused on office based and data centre activities.

Manufacturing operations at Blackness Road ceased in 2010/2011 and the large production and distribution building has been vacant ever since. Oracle has extensively marketed these premises and it has been proven that there is no occupier demand. This position is unlikely to change, something confirmed in the attached marketing report prepared by Cushman & Wakefield.

Consequently, Oracle wish to reconfigure their site to allow the business to focus on activities within a high amenity and predominantly office based environment. As part of this approach, there is an opportunity to deliver a new residential development as part of a reconfigured site, allowing for surplus brownfield land to come back into use and allowing our client to upscale their business operations.

Oracle has commissioned EMA Architects to prepare an indicative masterplan for the Blackness Road site and this illustrates how the site can be successfully reconfigured with the surplus operational land being redeveloped for residential use. The masterplan illustrates how the site can accommodate up to 200 new residential units in a high amenity setting and with strong pedestrian linkages with Linlithgow town centre.

Housing

It is evident from the MIR and the Proposed LDP that West Lothian Council are seeking to address a shortage of allocated housing sites in Linlithgow and the Proposed Plan allocates sites which could deliver 569 new homes in the forthcoming plan period (page 89).

Having reviewed the draft allocations it is evident that the Council's current proposals for Linlithgow rely heavily on greenfield releases and the loss of prime agricultural land. Indeed, of the 12 draft housing allocations (page 89), seven of these are greenfield sites and these greenfield sites are expected to deliver 88% of all the proposed new homes in Linlithgow.

This reliance on greenfield land is completely at odds with the LDP's vision of promoting development on brownfield sites and also runs contrary to Scottish Planning Policy (SPP) which requires development plans to promote sustainable patterns of development and for local planning authorities to promote brownfield land before new development takes place on greenfield sites (SPP, para 40).

Introducing housing as part of a reconfigured Oracle site is supported by Scottish Planning Policy with 'Designing Streets' (page 20) acknowledging that in recent decades, the dominant patterns of development have been those in which housing, employment, retail and other facilities have been developed in a segmentary fashion or zoned in separate areas, which are often poorly connected with one another.

The Proposed LDP simply follows this segregated approach to land use planning and does not allow for the creation of mixed use neighbourhoods. The opportunity at Oracle allows for the creation of a mixed use neighbourhood in line with Scottish Government policy, something that will lead to lower car use, contributing to wider transportation and environmental objectives. Integrating housing with employment uses in this way has been successful in other locations, for example at Edinburgh Park, Edinburgh, and Buchanan Business Park, Stepps.

Effectiveness

Our client has commissioned a suite of investigations which consider the suitability of the Oracle site for residential development and these investigations have considered matters relating to master planning, ground conditions, drainage, flooding, transport, employment land supply, noise impact and services.

These submissions are enclosed and demonstrate that the Oracle site is an effective development opportunity and there are no constraints which would prevent the site coming forward for development during the forthcoming plan period.

In terms of effectiveness, paragraphs 55 and 60 of Planning Advice Note 2/2010 set out criteria against which individual sites can be assessed to establish whether they could add to the available effective housing land supply. The Oracle site has been tested against each of these criteria as follows:

Ownership

- The site is in the single ownership of Oracle who will make the site available for residential development upon it being allocated for residential development in the Local Development Plan.

Physical

- Investigations undertaken by WSP have demonstrated that there are no physical constraints to the surplus land within the Oracle site from being developed for residential use. These investigations have considered matters relating to ground conditions, drainage, flooding, site services, noise and access.
- Partial redevelopment of the site for residential development will reduce the amount of existing impermeable surfaces, bringing benefits from a flooding and drainage perspective. This is a significant advantage which the site has over greenfield releases elsewhere in Linlithgow.

Contamination

- Investigations undertaken by WSP have indicated that the site is likely to be free of contamination and that its previous use is not a barrier to the site coming forward for residential development in the forthcoming plan period to provide marketable housing

Deficit funding

- No public funding is required to make residential development economically viable on the site

Marketability

- The site, or a relevant part of it, can be developed in the period under consideration and there is considerable confirmed market interest in Linlithgow from house builders.

Infrastructure

- The Oracle site benefits from having existing infrastructure provision which will allow for the site to come forward for development.

Land Use

- Housing is the sole preferred use of the surplus land in planning terms and the integration of employment uses and residential development is supported by Government policy in Designing Places.

Linlithgow Housing Allocations (Proposed LDP Page 89)

As explained above, the Oracle site at Blackness Road presents an opportunity to accommodate new residential development on a brownfield site and it should be regarded as being preferable to many of the proposed greenfield housing allocations presented at Page 89 of the Proposed LDP.

There are a number of draft allocations that we are concerned with and which are discussed below.

Firstly, included in the draft allocations is a site at 81-87 High Street (REF: HLL 1) that has already been developed as retirement living accommodation. As this is a completed development it should not be included as an opportunity for the forthcoming plan period.

Secondly, there are a series of other sites allocated for housing development in Linlithgow which are less well placed than the land at Oracle in terms of delivering new housing. Their allocation ahead of our client's brownfield site is contrary to Scottish Planning Policy and we are of the view that the Proposed LDP has not given due priority to directing housing to previously developed land.

In particular, the Proposed LDP allocates sites at Clarendon Farm (REF H-LL 10), Preston Farm (H-LL 12), Wilcoxholm (H-LL 11), H-LL 6 Mill Road and land east of Manse Road (H-LL 4) for new housing development. These sites are all less well placed than the land at Oracle to provide new housing in Linlithgow, either requiring the loss of prime agricultural land or located a significant distance from key services.

Analysis by ECS (attached) has demonstrated how the aforementioned sites are no better placed than the Oracle site in terms of their access to public transport and proximity to key services such as healthcare, schools and Linlithgow town centre. Indeed, those sites on the southern side of Linlithgow (Clarendon Farm (REF H-LL 10), Preston Farm (H-LL 12) and land east of Manse Road (H-LL 4)) are all positioned at a significantly higher elevation than the Oracle site, something that is likely to act as a disincentive to some walking trips. The sites at Clarendon are also of questionable effectiveness with significant uncertainty attached to issues of site access.

The presumption in favour of sustainable development is a significant material consideration and we consider that it supports reconfiguration of the Oracle site by way of a masterplan to allow for residential development on surplus brownfield land. Consequently, in sequential terms, the Oracle site should be preferred to the aforementioned allocations and although greenfield releases will be required to meet housing need in Linlithgow, these should not be brought forward at the expense of more sustainable brownfield opportunities.

Employment Land

In terms of employment land, the reconfiguration of the Oracle site would not have an impact on employment land supply as the existing vacant premises at Oracle have been the subject of extensive marketing and the enclosed employment land report confirms there is no market demand for their occupation.

Demand for the quantum of space provided at Oracle is exceedingly rare and demand for this type of space can be met in other more strategic locations such as at Livingston and Newbridge. Furthermore, it can be seen from Figure 2 (page 12) of the Proposed LDP that the total employment land allocations in West Lothian far exceed the SDP requirements and reconfiguring the Oracle site to allow for an element of housing would have no bearing on employment land supply in Linlithgow or West Lothian.

The Blackness Road site is a single user site and the current and future needs of our client's business can be met within a consolidated site. Moreover, Oracle is progressing with an ongoing programme of investment and employment within the Blackness Road site could rise from 100 existing employees to 300, delivering a net economic benefit for the town.

However, as part of their investment strategy, our clients do need to address the longstanding issue of the redundant manufacturing facility and reconfiguring the site to include an element of residential development would address this issue whilst offering the Council the opportunity to deliver housing on a brownfield site. The enclosed masterplan prepared by EMA, illustrates how residential development can be accommodated on the Blackness Road site and how this can be successfully integrated with Oracle's operational business.

Allocation EL18

The Proposed LDP identifies land to the east of Oracle for employment use (Ref EL 18), an allocation which is carried over from the existing adopted Local Plan. The EL 18 allocation is not required for any future expansion of Oracle, however our client's proposals would not prevent this site from coming forward if the Council wished to see it developed for other uses. It could certainly accommodate or Class 4 business uses if there were ever demand for such uses in the future.

Conclusions

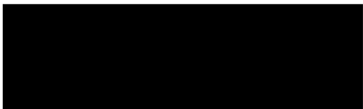
The reconfiguration of the Oracle site to allow existing surplus brownfield land to be redeveloped for housing is entirely consistent with Scottish Planning Policy, supporting sustainable economic development and reducing the Proposed LDP's reliance on greenfield sites to meet housing need in Linlithgow.

The evidence base prepared in support of the Blackness Road site demonstrates that the opportunity is effective and the site can come forward for development during the forthcoming plan period. Moreover, the reconfiguration of the Oracle site will have no adverse impacts on employment land supply and will actually help to create an environment which supports our client's programme of investment for Linlithgow.

We respectfully request that the emerging LDP is amended to include support for the proposed reconfiguration of our client's site by way of a masterplan and with explicit policy support for residential development on the identified surplus brownfield land.

We hope that the Council will respond positively to our client's proposals and our client is keen to engage with West Lothian Council to plan for the future of their Blackness Road site.

Yours sincerely



Graeme Laing MRTPI
Director



Enc.

Public Transport

The site is positioned adjacent to an existing bus corridor with bus stops located at regular intervals on either side of Blackness Road. The nearest stop is situated directly south of the development site, approximately 30m west of the main Oracle site entrance via Blackness Road. The aforementioned stop serves the E&M Horsburgh Linlithgow town loop service, as such, although located on the eastbound carriageway, it serves the main town centre to the west.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

The site can accommodate two vehicle access points direct from the public road which ensures a porous design in compliance with current policy. There are no congestion or road safety issues with the proposed access locations.

H-LL1 – High Street

We are aware that this site is being developed by a retirement home developer, as such, it is not available for mainstream housing. On this basis, no comparison is required.

H-LL 2 – Westerlea Court, Friars Brae

Walking

The site is located adjacent to Friars Brae, some 1.2km from the town centre boundary. The site is located further from the town centre boundary than the proposed site and on a steep gradient which would be a significant barrier to pedestrians. Although within the 1,600m walking distance to amenities, the gradient would likely result in the site being too distant for even the ablest pedestrians and therefore walking would not likely be a viable mode choice.

There are no Core Paths directly accessible from the site.

Cycling

The site is located adjacent to the residential streets which are subject to 30mph speed limit, therefore, are likely to be safe for cyclists. However, the gradient from the town centre would again impact on the attractiveness of this mode.

Public Transport

The site is located within 400m of a bus stop.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

The access from Friars Brae could only accommodate a minor allocation of residential units given it is constrained and visibility is poor.

H-LL 3 – Boghall East

Walking

The site is located adjacent to the A803, some 1.4km from the town centre boundary. The site benefits from existing infrastructure on Blackness Road, however, the footway is narrower along the site frontage.

The site is further east than the proposed site, therefore, it is further from the town centre and local facilities, however, it is within the 1,600m walking distance.

The site is not located adjacent to any Core Paths and is some 800m from the nearest, WL3 Linlithgow Loch Circular.

Cycling

The site has similar characteristic to the proposed site with respect to cycling accessibility.

Public Transport

The site is located within 400m of bus stops on Blackness Road and Springfield Road, however, these are further away than the proposed site.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

Vehicle access can be promoted direct from Blackness Road, however, there would only be sufficient junction spacing for one access which may limit permeability.

H-LL 4 – Land East of Manse Road

Walking

The site is located adjacent to Manse Road, some 1.2km from the town centre boundary. There are no footways on the east side of Manse Road adjacent to the site which may be problematic given the considerable stone wall and mature trees which would have to be removed to create appropriate linkage.

The site is located further from the town centre boundary than the proposed site and on a steep gradient which would be a significant barrier to pedestrians. Although within the 1,600m walking distance to amenities, the gradient would likely result in the site being too distant for even the ablest pedestrians and therefore walking would not likely be a viable mode choice.

The site is located adjacent to Core Paths WL4 Linlithgow to Beecraigs Link which utilises the existing infrastructure on Manse Road.

Cycling

The site is located adjacent to the residential streets surrounding Manse Road which are subject to 30mph speed limit, therefore, are likely to be safe for cyclists. However, the gradient from the town centre would again impact on the attractiveness of this mode.

Public Transport

The site is located within 400m of a bus stop on Manse Road.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

Vehicle access from Manse Road could be problematic given the mature trees and stone wall which will be within the visibility splay of any access junction. The proposed site frontage is located on a slight bend which would require additional trees and wall to be removed which may not be permissible in planning / land ownership terms.

H-LL 5 – Falkirk Road

Walking

The site is located approximately 700m from the town centre boundary and within a reasonable walking distance of retail offer on Falkirk Road.

Cycling

The site is located adjacent to Falkirk Road which incorporates dedicated cycle lanes, providing good access to the town centre and beyond.

Public Transport

The site is located within 400m of bus stop on Falkirk Road which benefits from various services with a regular frequency.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

The site benefits from an existing access on to Falkirk Road which could be utilised for a housing development.

H-LL 6 – Mill Road

Walking

The site is located adjacent to Mill Road, some 1.9km from the town centre boundary. Mill Road does not accommodate footways or street lighting for much of the frontage of the proposed allocation.

The site is approximately 800m from the existing retail stores on Falkirk Road, however, these don't represent all necessary amenities and trips to the town centre will still be required.

There are no Core Paths directly accessible from the site.

Cycling

Traffic calming has been introduced on Mill Road which is due to the speed of vehicles approaching the town limit from the north, as such, it is likely that the road network adjacent to the site would not be attractive to cyclists.

Public Transport

The site is within 400m of a bus service.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

Access from Mill Road may be achievable but the vertical alignment of the carriageway as it rises to cross the M9 would have to be considered in detail. The road is also a 60mph speed limit which would introduce safety concerns.

H-LL 7 – Clarendon House

Walking

The site is located adjacent to Manse Road, some 800m from the town centre boundary. The site is marginally closer than the Oracle site, however, the steep gradient is likely to be a considerable barrier to pedestrians. Although within the 1,600m walking distance to amenities, the gradient would likely result in the site being too distant for even the ablest pedestrians and therefore walking would not likely be a viable mode choice.

The site is located adjacent to Core Paths WL4 Linlithgow to Beecraigs Link which utilises the existing infrastructure on Manse Road.

Cycling

The site is located adjacent to the residential streets surrounding Manse Road which are subject to 30mph speed limit, therefore, are likely to be safe for cyclists. However, the gradient from the town centre would again impact on the attractiveness of this mode.

Public Transport

The site is located within 400m of a bus stop.

The site is approximately 600m from Linlithgow train station which is within the recognised walk distance of 800m, however, in reality, given the gradient on Manse Road it is unlikely that this would be an attractive route.

Vehicle

The existing access from Manse Road has been identified as the means of access for the site which is considered to be unsafe for intensification of use in its current form. The visibility splays at the junction are significantly restricted due to the large stone wall which make exiting the site virtually a blind manoeuvre.

The existing stone wall and mature trees would likely have to be removed to facilitate access which may not be permissible in planning terms.

H-LL 10 – Clarendon Farm

Walking

The site is located to the east of Oatlands Park residential area and to the south of H-LL 7. The site has no direct frontage on to any public adopted footway or infrastructure, as such, it is wholly dependent on land outwith the boundary of the site to facilitate access for all modes.

It would appear that the site is dependent on the delivery of H-LL 7 to create any access to Manse Road and, due to existing properties, access to Clarendon Road is not readily available, however, in an effort to make a comparison with the proposed site a direct link to Manse Road will be assumed.

H-LL 10 is some 1km from the town centre boundary which is similar to the Oracle site, however, the steep gradient is likely to be a considerable barrier to pedestrians. Although within the 1,600m walking distance to amenities, the gradient would likely result in the site being too distant for even the ablest pedestrians and therefore walking would not likely be a viable mode choice.

The site has no direct frontage on to the Core Path network.

Cycling

The residential streets surrounding the site are subject to 30mph speed limit, therefore, are likely to be safe for cyclists. However, the gradient from the town centre would again impact on the attractiveness of this mode.

Public Transport

The site is located outwith 400m of a bus stop even assuming a direct link can be created to Manse Road. The closest bus stop is approximately 600m from the site boundary and would require residents to travel south, up the Manse Road gradient, to reach the nearest bus stop.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

The site has no direct access to the adopted road network. The proposed plan indicates that the site could take access from the St Michael's Hospital access, however, this has limited capacity. The St Michael's Hospital takes access from the B9080 Edinburgh Road to the east of H-LL 10, south of the canal and outwith the town boundary. St Michael's Hospital is some distance to the east of H-LL 10

H-LL 12 – Preston Farm

Walking

The site is located adjacent to Deanburn Road, some 1.3km from the town centre boundary. The site is further from the town centre than the Oracle site and suffers from a gradient which, coupled with the distance, is likely to be a considerable barrier to pedestrians. Although within the 1,600m walking distance to amenities, the gradient would likely result in the site being too distant for even the ablest pedestrians and therefore walking would not likely be a viable mode choice.

Cycling

The residential streets surrounding the site are subject to 30mph speed limit, therefore, are likely to be safe for cyclists. However, the gradient from the town centre would again impact on the attractiveness of this mode.

Public Transport

The site is approximately within 400m of an existing bus stop.

The site is outwith the recognised walking distance of 800m to a railway station.

Vehicle

The council indicated that access will be proposed from Deanburn Road, however, the proposed allocation has very limited frontage with the aforementioned road. An adoptable vehicle access could not be constructed with Deamburn Raod within the land identified in the proposed plan, therefore, the effectiveness of this allocation has to be questioned.

Summary

This report has considered the accessibility of each of the proposed housing sites in the Linlithgow area with respect to the main modes of travel and recognised acceptable criteria from national policy. The following is provides a comparison with the Oracle site:

Walking

Only sites H-LL 1 and H-LL 5 can be considered to be better located with respect to walking. All other sites are located further from local amenities or on considerable gradients which will limit walking as a viable mode.

Sites H-LL 6, H-LL 10, H-LL 11 have serious doubts on their effectiveness given their lack of connection to the exiting footway network and distance from the core of the town centre.

Cycling

Only sites H-LL 1 and H-LL 5 could be considered as preferential for cycling.

Public Transport

All sites, with the exception of H-LL 10, are within 400m of a bus stop. All sites, with the exception of H-LL 1 and H-LL 7 are outwith the 800m to a train station. Due to the gradient on Manse Road, the effective distance of H-LL 7 will result in the walk being unattractive for most.

Vehicle

The majority of the sites can provide an adoptable standard vehicle access, however, sites H-LL 10 and H-LL 12 have limited or no boundary with the public road, therefore, the ability to create an adoptable access has to be in doubt. The exiting access to H-LL 7 is unsafe and should not be promoted for additional development given the visibility constraints.



Conclusions

When considering all modes of transport only sites H-LL 1 and H-LL 5 are more accessible than the proposed Oracle residential site on Blackness Road.

The site is located closer to the town centre than the majority of the sites and is not affected by gradients. It has comparable access to public transport facilities and has existing adoptable standard vehicle access junctions.

The site is compliant with national policy on accessibility and is preferential to the following sites with respect to accessibility - H-LL 2, H-LL 3, H-LL 4, H-LL 6, H-LL 7, H-LL 10, H-LL 11 and H-LL 12.