

**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    - for this site

**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

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"/>
<p>Please see attached submission.</p>			

Section title	<input type="text"/>		
Page nos.	<input type="text"/>	Paragraph nos.	<input type="text"/>
<p>Please see attached submission.</p>			

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

Settlement	<input type="text"/>		
Site address / location	<input type="text"/>		
Site Ref	<input type="text"/>	Page nos.	<input type="text"/>

Please see attached submission.

Settlement	<input type="text"/>		
Site address / location	<input type="text"/>		
Site Ref	<input type="text"/>	Page nos.	<input type="text"/>

Please see attached submission.

### **Additional comments**

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

Please see attached submission.

# HolderPlanning

Town Planning and Development Consultants

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

20<sup>th</sup> November 2015

Our ref: TAYL/011

Your ref: WLLDP

Dear Sir,

**WEST LOTHIAN LOCAL DEVELOPMENT PLAN – PROPOSED PLAN  
SUBMISSION ON BEHALF OF TAYLOR WIMPEY – KINGSFIELD, LINLITHGOW**

Please find enclosed representations made on behalf of Taylor Wimpey in response to the Proposed Plan.

The representations relate to land at Kingsfield, Linlithgow and seeks a modification of the Proposed Plan to remove the site from the Countryside Belt and allocate it for housing, with an indicative capacity of 350 new homes. The following documents are submitted:

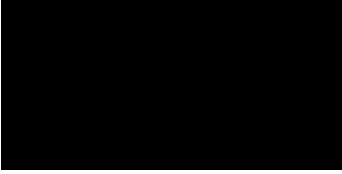
- Development Framework (OPEN – November 2015)
- Housing Land Supply & Demand (HolderPlanning – November 2015)
- Countryside Belt Objection (HolderPlanning/OPEN – November 2015)

Our submission on Housing Land & Supply Assessment indicates that there is a significant shortfall in the identified housing sites to meet the Housing Supply Target in the two periods identified by SESplan i.e. 2009 – 2019 and 2019 – 2024. Furthermore, at no point between 2017 and 2024 will there be an adequate 5 years housing land supply. Accordingly, a substantial number of additional effective housing sites need to be allocated to reflect the terms and requirements of SESplan and Scottish Planning Policy.

The accompanying Development Framework demonstrates the suitability of Kingsfield for housing development. The site has the capacity to accommodate around 350 new homes, which will help to address future housing provision identified within SESplan for the city and surrounding regions. A development of this capacity will allow flexibility for the creation of an attractive and distinct urban form, responding positively to the surrounding area. A variety of house types will offer housing choice for different sections of the community, including affordable housing; therefore, providing real opportunity for proper future sustainable growth of the town.

We trust that the terms of this representation are clear and would be happy to discuss any aspect in greater detail with West Lothian Council.

Yours sincerely,



Naomi Cunningham  
Senior Planner

**HolderPlanning**

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Proposed West Lothian  
Local Development Plan  
Representation

Housing Supply & Demand

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On behalf of

Taylor Wimpey

19<sup>th</sup> November 2015

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Submitted by  
**HolderPlanning**

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## 1. Introduction

- 1.1 This representation considers issues relating to housing supply and demand and the adequacy of the Proposed West Lothian LDP in addressing the requirements of SESplan, its related Supplementary Guidance and Scottish Planning Policy.
- 1.2 As described below, the content of the Proposed LDP is not consistent with any of these, and therefore cannot be progressed to adoption in its current form.

## 2. SESplan and Supplementary Guidance (SG)

- 2.1 SESplan is the Strategic Development Plan (SDP), which was approved in 2013. Policy 5 (Housing Land) explains that for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built in the SESplan area. Moreover, it indicates that the requirement for the period 2009 to 2019 is for 74,835 houses. It then goes on to say that:

***“Supplementary Guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009 – 2019 and in the period 2019 to 2024”***

- 2.2 Table 3.1 of the Supplementary Guidance identifies West Lothian’s housing requirement as 11,420 homes for 2009 – 2019 and 6,590 homes for 2019 – 2024. In accordance with SESplan Policy 5, sufficient housing land therefore needs to be allocated within the West Lothian LDP to enable these numbers of houses to be built in each period.
- 2.3 **Figure 5 of the Proposed LDP shows clearly that this is not achieved, as it shows a shortfall of 3,263 homes by 2019.** As explained in Section 3 of this report, the housing shortfall is in fact far greater than this, but it is unclear why the Council is promoting the Proposed LDP in this form, when even by its own calculation it is deficient.
- 2.4 We therefore assume the Council’s position is that the content of the Proposed LDP is based on the view that part of the housing requirement for the period 2009 – 2019 can be deferred to the period 2019 – 2024. However, recent appeal decisions in West Lothian and other SESplan Council areas have categorically determined that this is not a reasonable or logical argument to make. Most recently, in November 2015, the Scottish Ministers awarded expenses against Edinburgh Council in respect to a recalled appeal on a site known as The Wisp, for the following reason:

***“In relation to the calculation of the housing land supply in the context of this appeal, the council chose to calculate a total plan period figure to 2024. SESplan, the Strategic Development Plan (SDP) and its associated Supplementary Guidance (SG), contains Policy 5 which clearly states in the last sentence of the first paragraph that the requirement for each council area should be met for each of the two periods, up to 2019, and 2019 to 2024. In neither written statements or at the hearing did the council provide a satisfactory explanation for their contrary approach. I conclude that the calculation of the housing land supply by the council, in relation to this appeal, was not in accordance with the SDP or the SG and that the council behaved unreasonably”.***

2.5 As well as being contrary to SESplan Policy 5 and the Supplementary Guidance, the Proposed LDP is also contrary to SESplan Policy 6, which states:

***“Each planning authority in the SESplan area shall maintain a five years’ effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5”.***

2.6 In contradiction of this, paragraph 5.41 of the Proposed LDP states:

***“However, the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HoNDA2. In particular, the most up to date demand figure will be used to calculate the five year housing land requirement in the context of a revised housing land audit process...”***

2.7 In previous paragraphs, the Proposed LDP describes the recent HoNDA as a material consideration and refers to the content of the SESplan 2 Main Issues Report. In our view it is fundamentally wrong to suggest that either of these documents comprise material considerations for the Proposed LDP. By law, this LDP must be consistent with the Strategic Development Plan. The new HoNDA has no policy status, and has not yet even been translated into a draft future housing requirement for West Lothian, it being notable that the SESplan 2 Main Issues Report did not make recommendations in that regard. The SESplan 2 Main Issues Report is a consultation document and, as it acknowledges itself, is not even a draft plan. It therefore, has no status in relation to the West Lothian Local Development Plan.

2.8 In summary, therefore, the Proposed LDP is contrary to SESplan in two main respects. Firstly, it does not allocate sufficient housing land to meet the housing requirement identified in Policy 5 and, secondly, it proposes to calculate the 5-year housing land supply in a manner against the express terms of Policy 6. Both these approaches would have the effect of suppressing the delivery of housing to meet the requirement agreed by West Lothian and the Scottish Government in 2014.

2.9 As explained in paragraph 119 of Scottish Planning Policy, the West Lothian LDP is required to allocate a range of sites which are effective or capable of becoming effective to meet the housing requirement of the Strategic Development Plan up to year 10 from the expected year of adoption. As the adoption date is expected to be 2017, the Proposed LDP there needs to identify sufficient land to meet the housing requirement until 2027.

2.10 The Proposed LDP does not do this, and instead only identifies a housing requirement up until 2024. In order for the LDP to be consistent with Scottish Planning Policy, it therefore needs to identify an additional housing requirement for the period 2024 – 2027 and the additional sources of housing supply that will meet this requirement.

2.11 The following section considers in greater detail the changes required to Proposed LDP Figure 5 in order to achieve consistency with SESplan and Scottish Planning Policy.

### 3. West Lothian Housing Supply and Demand

- 3.1 Figure 5 of the Proposed LDP purports to explain how much housing is required in West Lothian and how much is being provided to meet the requirement. We disagree with some significant aspects of the content of Figure 5, which are described below. There is also some confusing terminology, which is not helped by the fact that some definitions have been changed by new Scottish Planning Policy (SPP 2014) since SESplan and the Supplementary Guidance were approved.
- 3.2 It should be noted that following publication of the Proposed LDP, we and other parties sought more detailed information regarding the derivation of the housing numbers in Figure 5, as for some reason there was no background technical document, which is provided with most other Proposed LDPs. The Council eventually provided us with some background information, but unfortunately this was too late to fully assess its content before the deadline for this representation. The document provides the detailed programming estimates for all anticipated housing sites, and it is our initial view that it is highly optimistic in its assumptions for the delivery of constrained sites and new LDP allocations. We are able to comment on this below, in general terms, but reserve the right to submit further detailed comments in due course.

#### Definitions

- 3.3 SPP 2014 introduced the phrase Housing Supply Target (HST), which is defined as the total number of homes that will be delivered. This is the same as the definition of 'Housing Requirement' used in SESplan and the Supplementary Guidance. The potential confusion arises because the definition of Housing Land Requirement in SPP 2014 is defined as the Housing Supply Target + Generous Margin (SPP Diagram 1).
- 3.4 The terminology in Figure 5 of the Proposed LDP is therefore incorrect. Line A should be called the West Lothian LDP Housing Supply Target and not the Housing Land Requirement. Line C should be called Housing Land Requirement. We have reproduced Figure 5 (Revised) below using the correct terminology.

#### Revised Figure 5

- 3.5 The following paragraphs explain our proposed revisions to the figures contained in LDP Figure 5.
- 3.6 Aside from the confusion in definitions described above, Line A correctly identifies West Lothian's partitioned housing supply targets i.e. 11,420 homes in the period 2009 – 2019 and 6,590 homes in the period 2019 – 2024.

#### Generosity

- 3.7 Line B proposes a generosity allowance of 10%. Paragraph 116 of Scottish Planning Policy states that the Housing Supply Target ***“should be increased by a margin of 10 to 20%...the exact extent of the margin will depend on local circumstances but a robust explanation for it should be provided in the plan”***. The Proposed LDP does not provide an explanation, and it might be assumed that the figure of 10% has been chosen because it is the lowest possible.

3.8 The Scottish Government has elaborated on the meaning of the term ‘generosity’ in its response to the proposed SESplan Schedule 4 on housing issues as follows:

***“To be clear, the Scottish Government’s view is that a generous land supply is arrived at by first identifying a robust and justifiable housing requirement, and then allocating more than enough (their emphasis) land to meet this. Generosity is therefore a concept associated with the housing land supply and not with the housing requirement. It is also inherent in the concept of a generous housing land supply that not all allocated sites will in fact be developed.”***

3.9 In short, the function of the generosity factor is to make up for losses that are likely to occur over the life of the plan. The generosity margin to be added to the housing supply target should therefore reflect the degree of certainty as to the deliverability of the housing land supply that has been identified to date.

3.10 In our view, a sensible and realistic approach requires to be taken to generosity. If a very optimistic approach is being taken in the LDP towards the delivery of housing supply from the various sources, particular if this includes constrained sites and windfall, then clearly this increases the risk that the supply will fail to a significant degree. In these circumstances, therefore, it is sensible to apply the highest generosity factor i.e. 20%.

3.11 Our Revised Table 5 accepts the Council’s apparently optimistic estimates for the delivery of constrained sites and the new allocations. However, should more detailed analysis of the Council’s proposed programming establish that the delivery estimates are so over-optimistic that even a 20% generosity allowance is unlikely to be sufficient to ensure that the supply is adequate to meet the requirements, we reserve the right to make further comment on Figure 5.

### ***10 Year Housing Requirement***

3.12 The Proposed LDP only provides for meeting the housing requirement for 7 years after the date of its adoption (2017 – 2024). As explained above, this is contrary to Scottish Planning Policy, which identifies 10 years as the relevant period. We have therefore attached additional columns to Revised Table 5 to show this additional requirement and the housing supply contributions.

3.13 As the SESplan Supplementary Guidance only identifies a West Lothian specific housing requirement up until 2024, it is necessary to consider what additional housing requirement needs to be identified for the period 2024 – 2027. In our view it should derive from SESplan Table 2, which identifies the housing requirement in the 8-year period from 2024 – 2032 as 47,999 houses for the region as a whole. This would equate to 18,000 homes for the 3-year period from 2024 – 2027. If one then applies the same relative distribution between the SESplan Council areas as agreed in the Supplementary Guidance, that would be 17% for West Lothian, which is equivalent to an additional housing supply target of 3,060 homes. With the addition of 20% generosity, this would amount to a housing requirement from 2024 – 2027 of 3,672 homes.

3.14 The information provided by the Council does not indicate what the predicted supply over that period 2024 – 2027 will be. Clearly this needs to be known in order to establish what the shortfall will be and from this the requirement for additional allocations.

3.15 Revised Figure 5 shows that land for an additional 4,415 houses needs to be allocated to achieve the SESplan Policy 5 house-building requirement for the period 2009 – 2019. Figure 5 also shows a shortfall of 1,418 houses by 2024. From this it is implicit that at no point between 2017 and 2024 will there be an adequate 5-year housing land supply. There is an additional requirement for the period 2024 – 2027, but the Council has not provided enough information to establish how many additional housing sites are required to meet this.

**Revised Figure 5**

<b>Setting the LDP Housing Land Supply Target</b>	<b>2009 – 2019</b>	<b>2019 - 2024</b>	<b>2009 - 2024</b>	<b>2024 - 2027</b>	<b>2009 - 2027</b>
(A) West Lothian Housing Supply Target	11,420	6,590	18,010	3,060	21,070
(B) + 20% to ensure a generous supply	2,284	1,318	3,602	612	2,214
(C) LDP Housing Land Supply Target	13,704	7,908	21,612	3,672	25,284
<b>Meeting the LDP Housing Land Supply Target</b>					
(D) Effective Supply	4,799	4,279	9,078	?	?
(E) Constrained Sites coming forward	642	3,716	4,358	?	?
(F) Housing Completions 2009-2013	2440	0	2,440	0	?
(G) Windfall	480	400	880	?	?
(H) Demolitions	-568	-100	-668	?	?
(I) Total Supply from Existing Sources (D + E + F + G – H)	7,793	8,295	11,730	?	?
<b>(J) House building Target to be met through new LDP allocations (C – I)</b>	<b>5,911</b>	<b>- 387</b>	<b>9,882</b>	<b>?</b>	<b>?</b>
<b>New LDP Allocations</b>					
(K) Estimate of Total Houses Built on New LDP Allocations	1,496	2,610	4,106	?	?
(L) Shortfall/Surplus	4,415 Shortfall	2,997 Surplus	1,418 Shortfall	?	?

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Proposed West Lothian  
Local Development Plan Representation

Countryside Belt

**Kingsfield, Linlithgow**

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On behalf of

**Taylor Wimpey**

20<sup>th</sup> November 2015

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## 1. Introduction

- 1.1 This representation is submitted on behalf of Taylor Wimpey and addresses issues relating to Countryside Belt in respect to land at Kingsfield, Linlithgow. It should be read in conjunction with our submissions on Housing Land Supply & Demand and the Kingsfield Development Framework, which support the allocation of the site for housing development.

## 2. Countryside Belt and Settlement Setting

- 2.1 West Lothian Council has a policy called “Countryside Belt” within the adopted Local Plan of 2009. It covered land around Livingston, between Bathgate and Whitburn, and between Winchburgh and Broxburn. Its main purpose was to protect the settlements against urban sprawl, but to also provide opportunities for recreation and landscape enhancement.
- 2.2 There was no specific discussion paper on “Countryside Belts” within the MIR, nor was there any potential designation areas shown.
- 2.3 Within the Proposed Local Development Plan this designation is expanded to be “*Countryside Belts and Settlement Settings*”. The policy (ENV7) has been expanded to include East Calder/ Kirknewton and Linlithgow/ Philipstoun. The purpose of this is described as:

*“Countryside Belts are spatial designations, and critical planning tools somewhat like statutory greenbelts around Scotland’s cities, for the purposes of controlling urban spread into the countryside. A key purpose is to maintain the identity of towns by avoiding coalescence. Protecting the setting of settlements is another important purpose of countryside belts”*

- 2.4 In effect therefore, the Proposed LDP is proposing to designate large swathes of countryside around its principal towns as greenbelt, but by another name i.e. Countryside Belt. Such an approach is contrary to Scottish Planning Policy, which states in paragraph 49 states that:

*“For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where a planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy...”*



2.5 In our view, there is nothing exceptional about West Lothian's towns that merits equivalent designations to green belt, and it is notable that the Council has not provided any detailed analysis to justify the identification of Countryside Belts in the LDP.

2.6 The Council make it clear that the designation doesn't reflect landscape quality. The strategic purposes of Countryside Belts are to:

- maintain the separate identity and visual separation of settlements;
- protect the landscape setting of settlements;
- promote public access to green space for informal recreation; and
- enhance landscape and wildlife habitat.

2.7 The policy states that development will not be permitted within the Countryside Belts without satisfying a list of criteria. What the Council doesn't do, however, is produce any background paper on why these areas have been selected, or the process that was undertaken to define boundaries. Reference is made within Policy Env1 to Supplementary Guidance 'Landscape character and local landscape designations' and 'Green Networks' which may provide some information however these don't appear to have been published yet.

2.8 Regarding the purpose of the Countryside Belt as it affects east Linlithgow the following aspects should be considered:

- The edge of the proposed development area of Kingsfield is 1.65km away from Philipstoun; this requires detailed study but it is unlikely development in west Linlithgow would affect the visual identity of Philipstoun;
- As with any land release, development would affect the setting of the settlement however visibility to the site is not extensive: there would be views from Blackness Road, from the south-east edge of Linlithgow and glimpses from the minor route network;
- Public access is already promoted, and well-used, through the path south of the site boundary;
- The land area is currently low in wildlife value; it is grazed by horses and there are lost opportunities at the Errick Burn where there is only a limited riparian edge. Development doesn't necessarily preclude improved biodiversity.

2.9 The Council have carried out two published landscape reviews since 2009.

2.10 The first of these is the West Lothian Local Landscape Designation review, which was prepared in June 2013 by LUC on behalf of the Council. The focus for this study was to:

*“review the provision of local landscape designations in West Lothian, and to carry out an evaluation of the West Lothian landscape, leading to a new, more robustly justified single tier of Special Landscape Areas”.*

2.11 The study does make reference to the other landscape policies but when referring to the Countryside Belt policy states:

*“The local plan contains other policies which relate to protection of landscape and countryside such as for Countryside Belts and Areas of Special Agricultural Importance. These policies are of relevance to the LLDR, although the review does not make recommendations on these other types of designations.... These will be reviewed separately by the council through the Local Development Plan process.”*

2.12 What is worth noting about the study however, is that it took previous Landscape Character Assessment work as its baseline and divided the area up into landscape units, based on a refinement of those previous studies. The fringes of Linlithgow were named Landscape Unit Type 20 and this was assessed for suitability in inclusion of the new Landscape Special Area status. Following analysis, the areas within the west and south of the unit were considered to be the most important part of it and were included within the revised LSA boundaries. The eastern half of the unit wasn't considered for inclusion, and isn't analysed to any degree within the text.

2.13 The second document concerning landscape was prepared by the Council “West Lothian Landscape Character Classification”, produced in June 2014 as a background paper to the MIR. One of the reasons the Council publish it is because *“development planning requires it to be taken forward as an independent document to support the LLDR [Local Landscape Designations Review] as part of the Local Development Plan process.”* The document is a record of changes to the Landscape Character Units made to the original Landscape Character Assessment of 1998, with updates due to the LUC Report and a report on wind capacity in 2011. It reports on the Landscape Character Type of which Linlithgow is in the Lowland Hill fringe within the unit “Linlithgow Fringes”. The key characteristics of each unit are outlined but not extrapolated to reach any conclusions as to what this might mean for LDP policy.

### 3. Conclusion

3.1 We object to the Countryside Belt policy as a matter of principle. It is simply a green belt policy by another name, the blanket use of which is not supported by Scottish Planning Policy.

3.2 Kingsfield has been designated for the expanded Countryside Belt policy without any justification. In assessing the proposed development sites against the policy objectives the following aspects should be considered:

- Linlithgow has traditionally been an east-west orientated town. Options for future growth have now been made extremely limited through the proposed policies within the proposed LDP; something will have to be sacrificed if Linlithgow is to grow beyond the current identified land releases. This will either be the Special Landscape Area or the Countryside Belt, and whether or not the urban form changes and encroaches on the valley edges. Either way, the landscape setting of Linlithgow will be affected;
- How this balance should be made is impossible to determine without the evidence of how the Council established an analysis of the landscape area around Linlithgow and applied it to the Countryside Belt setting;
- Growth will always bring landscape change; all development land release will bring the edge of Linlithgow further into the countryside and increasingly removed from the town centre. An option for the Council would be to accept that the east of the town is the logical growth area and to be proactive rather than reactive, through establishing a future development framework for the area that contains principles which mitigate against the negative aspects identified within the SEA.
- It should be accepted that Linlithgow will grow, and that the Council considers now what an expanded settlement might be in the future, what it needs to flourish, and how it should be defined. Best practice would suggest that this is a process that should start now.

3.3 Although we do not consider a Countryside Belt policy to be appropriate, if one should be identified, the Kingsfield site should not form part of it.



Proposed West Lothian Council Local Development Plan  
Kingsfield, Linlithgow

Development Framework

Submission

November 2015



Kingsfield, Linlithgow

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M9

Junction 3

M9

LINLITHGOW

Key:

- Proposed Development Site
- Land currently being promoted by others
- Land allocated for employment

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

fig. 01: Kingsfield Site Boundaries

# 1. Introduction

## 1.1 This Submission

This is a submission to the West Lothian proposed Local Development Plan (LDP) consultation. It concerns land to the east of Linlithgow which has not been allocated, and which is proposed for housing. The site is of size 23.5Ha and is currently in agricultural use.

It was reviewed within the MIR as site EOI\_0165. It was rejected mainly on grounds of being outwith the settlement envelope, although other issues are identified which are commensurate with the release of greenfield edge-of-settlement land within this area. The land area has been increased since that submission and is now being promoted by Taylor Wimpey.

It is appropriate that the LDP considers the future growth of Linlithgow, so that growth is planned rather than responsive. This submission takes the position that this site offers a logical site for future allocation and sets out the principles for this to happen in a manner which can offer best possible fit with the existing settlement.

## 1.2 Site Location

The site is located to the east of Linlithgow, south of Blackness Road which is the eastern approach to Linlithgow from Junction 3 on the M9, and north of the railway line that connects Linlithgow to Glasgow and Edinburgh.

The western boundary abuts the eastern residential edge of Linlithgow which is currently bounded by a mature edge of trees and hedgerow. The northern edge is a field boundary of post and wire fence, some scrub and hedgerow trees. The eastern boundary partially consists of a minor road connecting Blackness Road to the B9080 and the existing development around Kingsfield Farm including steading conversion and expansions for residential use. The Errick Burn forms the southern boundary; a small burn which flows east, eventually running into the Firth of Forth.





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

fig. 02 : Kingsfield Site, Diagram showing landscape features

# 2. Site Description

## 2.1 Land Use

The land is grassland, currently used for grazing horses. The UKSO (UK Soils Observatory) database identifies the land as being Class 2 Capability for Agriculture; all land around Linlithgow is either 2 or 3.1, meaning that it is all Prime Land. See attached extract from the UKSO database.

## 2.2 Site Characteristics

### Character

The site has an open character, with long range views across a wide valley contained to the south by gently rising hills. The landscape is ordered, with defined agricultural fields broken by small pockets of woodland and field trees. It also shows clear evidence of being a settled landscape, with views of regular trains crossing through the rural hinterland, small groups of development and businesses. Local to the site, this is typically evidenced by the Kingsfield Leisure Development across the road consisting of golf course, putting green, specialist golf shop and cafe and residential development around the farm and steading buildings. The edge of Linlithgow is apparent to the west.

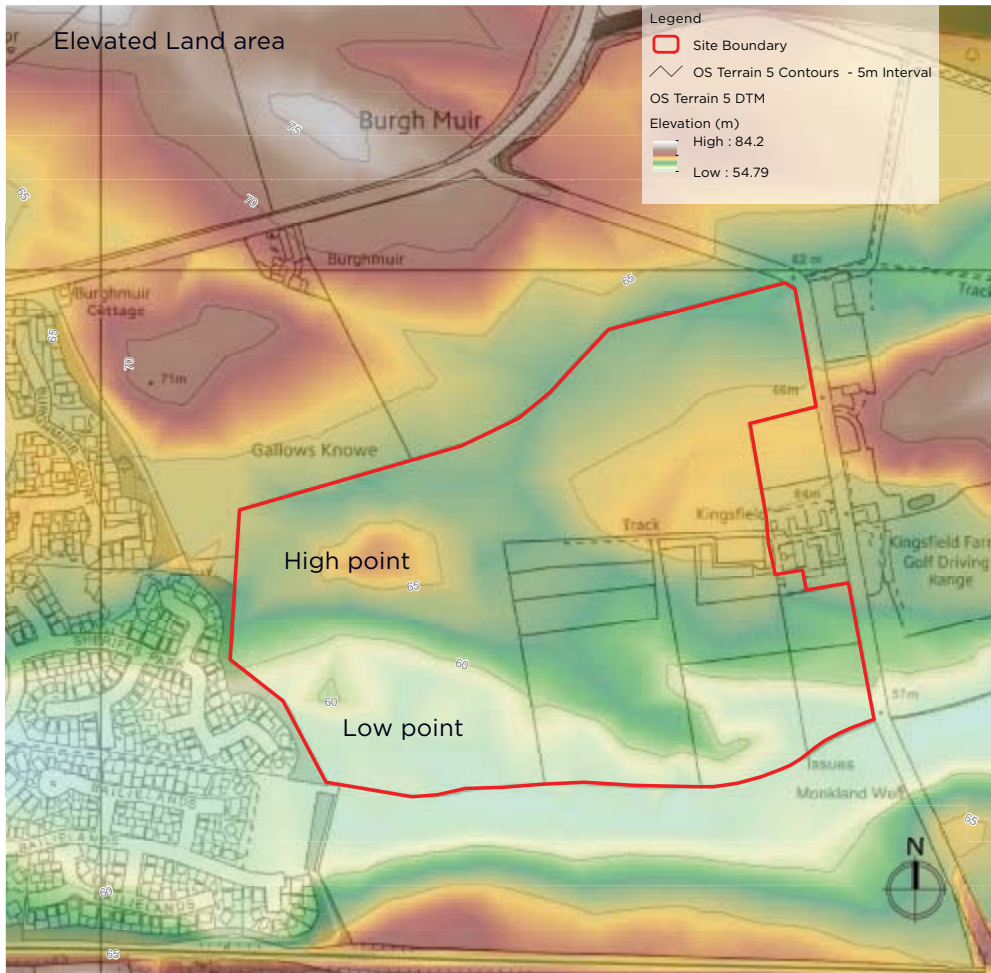


fig. 03 : Kingsfield Site Topography

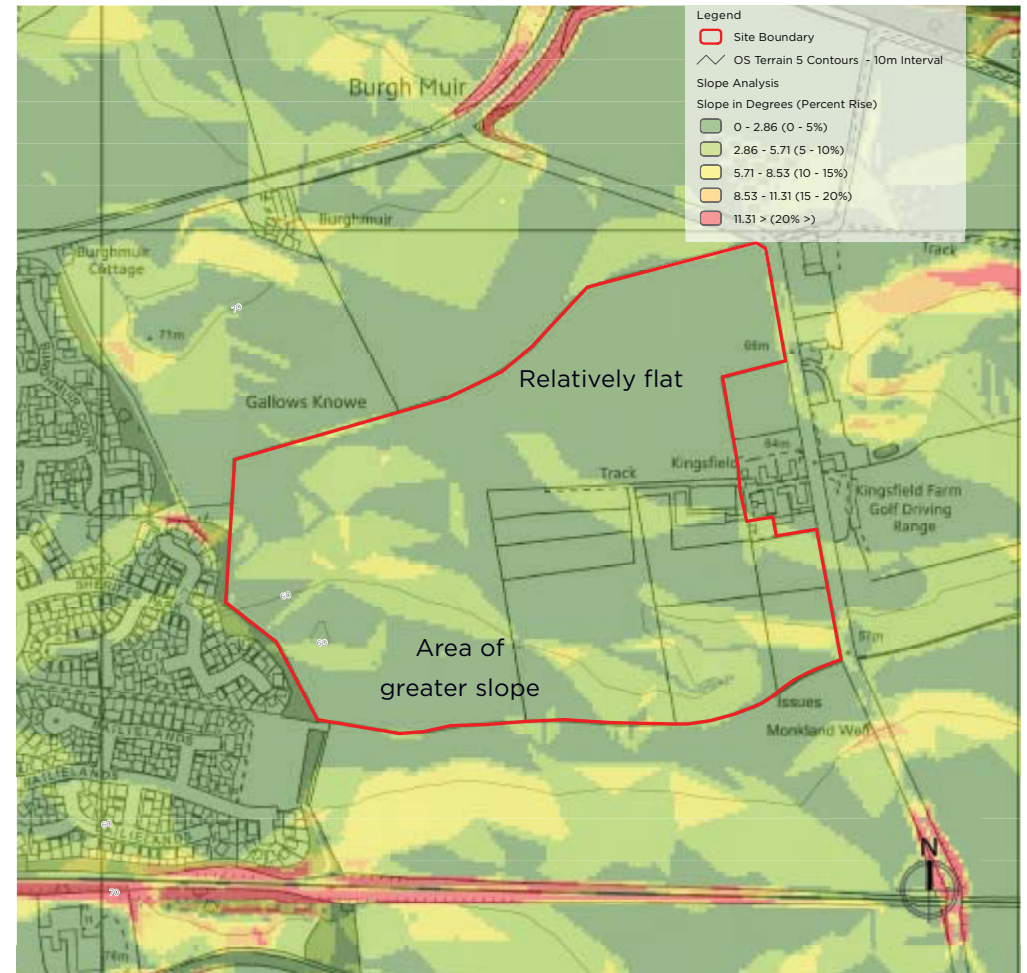


fig. 04 : Kingsfield Site Slope Analysis



Footpath along Blackness Road



Minor Road on Eastern Boundary



Path along Southern Edge



Path along Southern Edge

## Topography

The accompanying diagrams highlight the site topography. One showing elevation, the other slope. The elevation diagram highlights the lower land along the Errick, with land rising from the site to the south along the Union Canal (built along the 73m contour), and to the north elevated land at the M9 and on the approach into Linlithgow. The site itself sits relatively low in the ground when viewed within its context.

The slope diagram shows that the site is relatively flat and so well-placed to accommodate new development sustainably without significant ground works.

## Site Features

The site has very few existing features. The land area is subdivided into smaller parcels but there are mainly defined by fencing, with limited hedging and some walling along the road frontage. Stone walling is a feature of the area but there is very little within the site itself with the exception of this. Site features are marked up on the accompanying aerial photograph.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

## Views

A number of views to and from the site are reproduced within the attached photographs, with key points highlighted.



Viewpoint 1 Shared greenspace accessed by southern boundary path



Viewpoint 2 panorama looking south to Kingsfield site



Viewpoint 3 panorama looking west across Kingsfield Site

South eastern part of proposed site



Viewpoint 4 panorama looking north west across Kingsfield site

Developed edge and existing mature trees

Low point, holding water

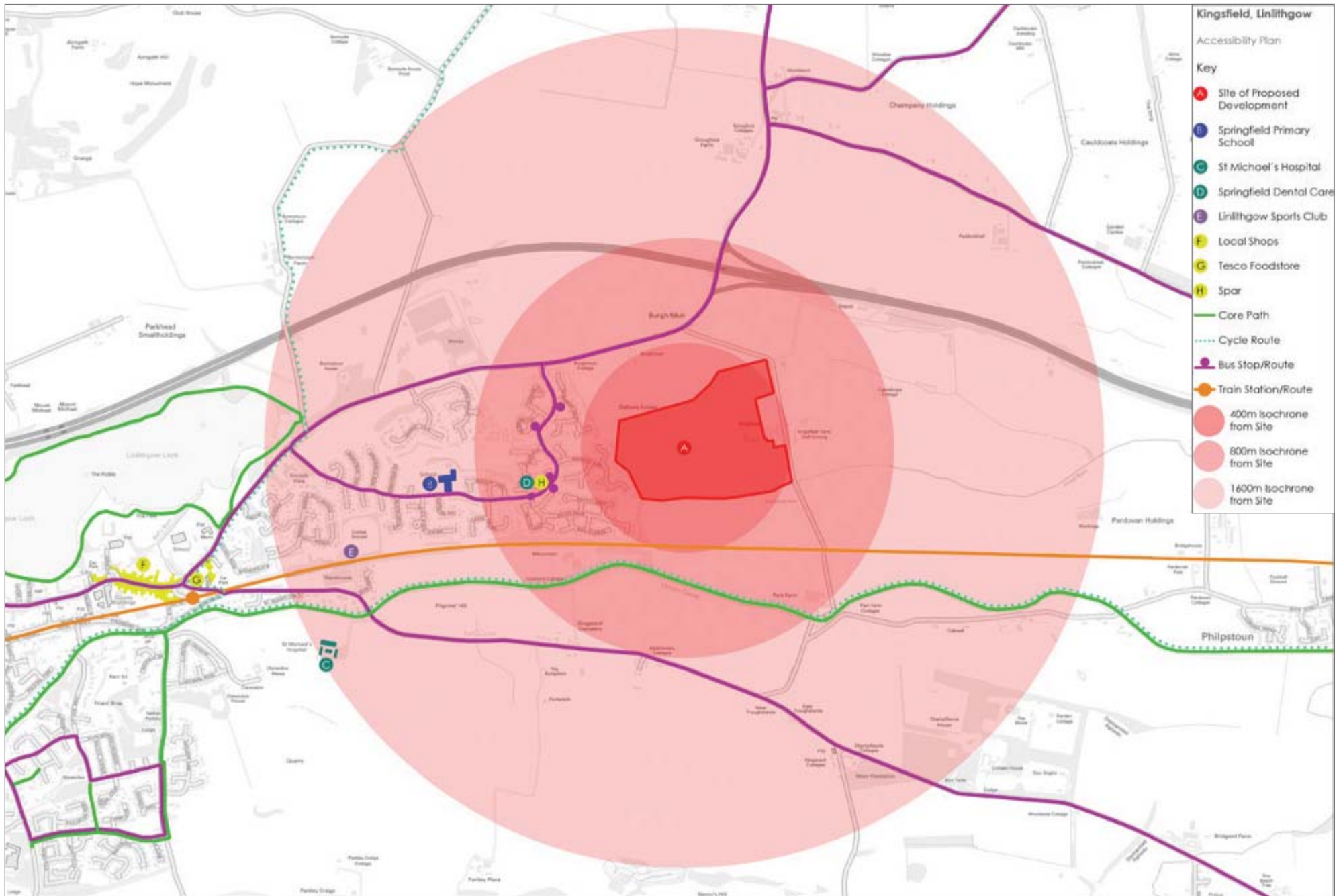
Northern boundary



Viewpoint 5 panorama looking north across Kingsfield site, from public path







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## 2.3 Connectivity

The site is accessed directly off a minor road leading from the A803 Blackness Road, the road which leads from Junction 3 on the M9 to the town centre. The minor road crosses the Union Canal and the railway line to connect with the B9080, the main road leading south-east out of Linlithgow. It serves a number of properties including Kingsfield Golf Centre east of the site and the Park Bistro, located at the canal.

A path close to the southern boundary is an “other path” on the Core Paths Plan and is unmetalled but well-used. It is signposted and connects with paths within the adjacent development to the west of the site, leading onwards into the town centre.

Blackness Road has a footpath all along its southern edge and is lit from close to where it meets with Springfield Road. Bus services are located on this road; a stop is located close to Oracle, and bus services enter the adjacent development at Springfield and there are a number of bus stops.

The Canal towpath, to the south, is both a core path and a National Cycle Route (NCR 754). A number of core paths and another National Cycle route lie to the north, on the other side of the motorway.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

fig. 07 : Kingsfield: site in relation to Linlithgow

# 3. Linlithgow



## 3.1 Description

Linlithgow is a Royal Burgh and county town of West Lothian. It is strategically well-positioned, being located on the Union Canal and on what was the main road between Edinburgh and Stirling before construction of the M9.

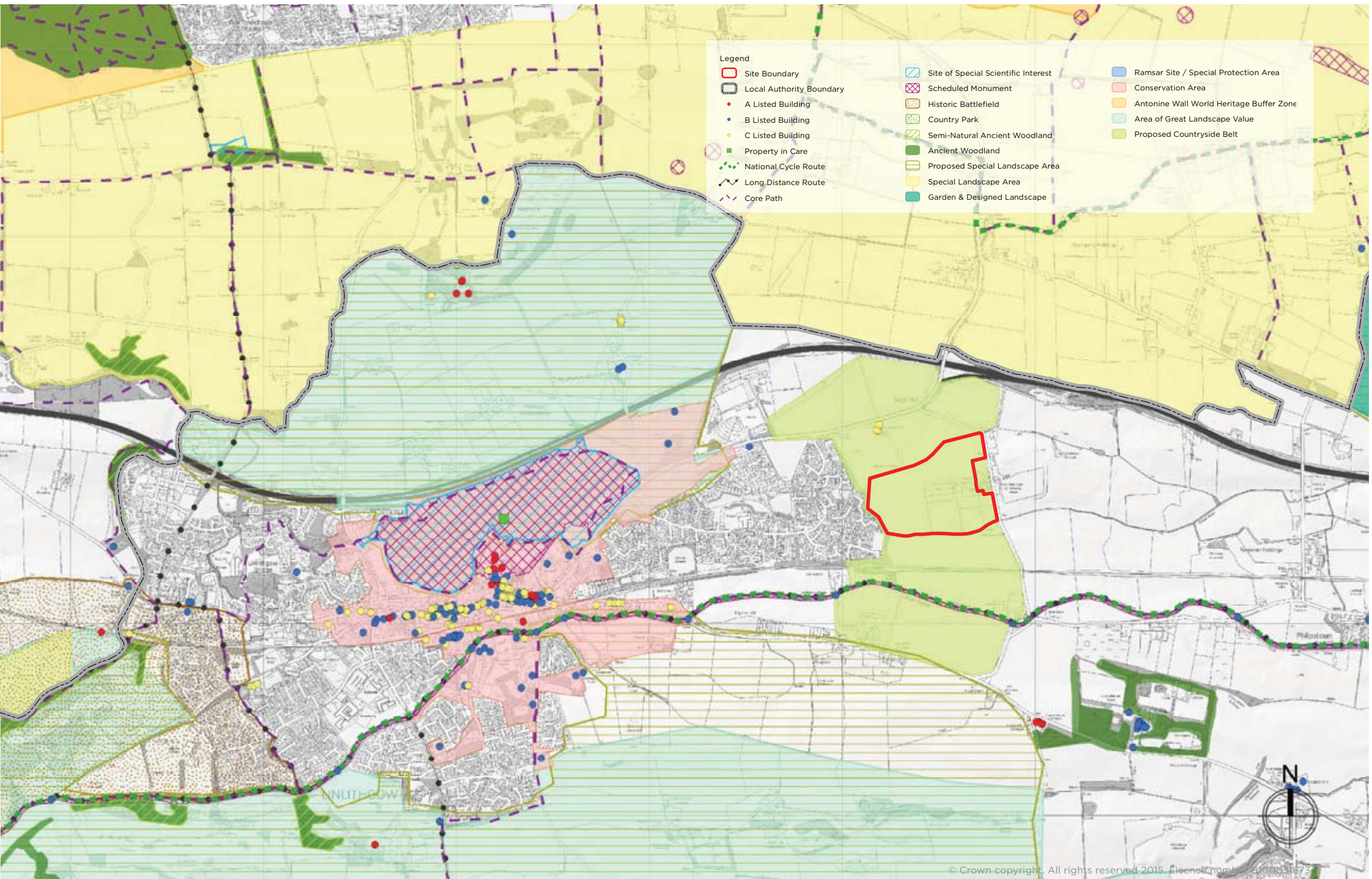
The town retains a historic character; the main features are Linlithgow Palace and St Michaels Church which lie close to Linlithgow Loch and are the most distinctive feature about the town. The High Street townscape has a unique sense of identity with a rich mix of architecture and cultural features.



The population numbers around 13,000; Livingston is the largest of the West Lothian settlements being around four times that size. However, Linlithgow supports a broad economic base; Oracle is a large local employer, its location is attractive to commuters both east and west and as a tourist centre it supports a service industry.

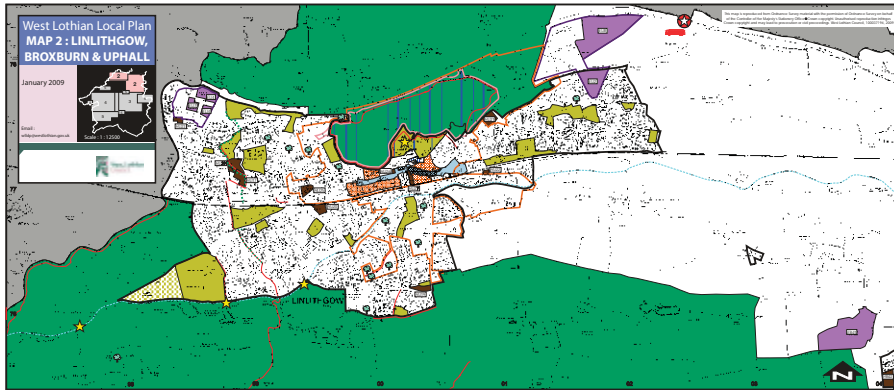


Linlithgow Character



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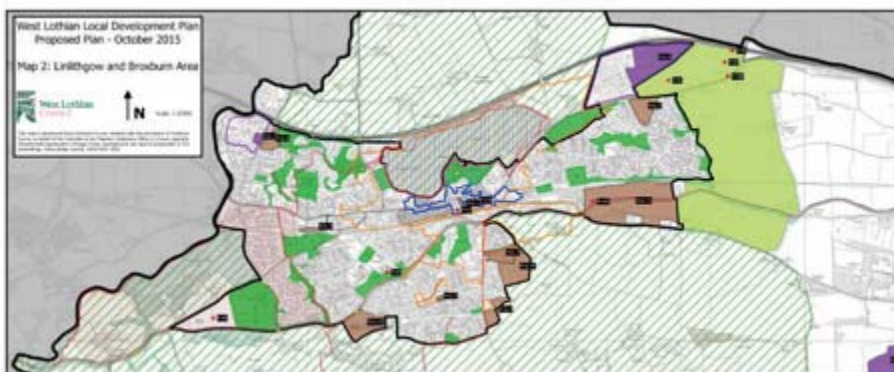
fig. 08 : Kingsfield Site in context with surrounding Landscape Designations



Adopted Local Plan 2009



Main Issues Report 2014



Proposed local development plan 2015

## 3.2 Policy protection

In keeping with its historic status, Linlithgow has a significant number of protective policies and designations. These are shown on the attached diagram. A proportionally large Conservation Area covers much of the town centre, and includes a large number of listed buildings. The Loch and associated buildings are Scheduled Monuments to the north as is the Union Canal to the south. Similarly, the landscape around the town is well protected, with proposed Special Landscape Areas in transition of replacing Areas of Great Landscape Value to the south and north and the historic battlefield site of the battle of Linlithgow Bridge (a power struggle in 1526) located to the south-west of the settlement.

The proposed LDP also identifies a local policy of Countryside Belt to the east of Linlithgow; this is also shown on the plan and is discussed further within the following sections.

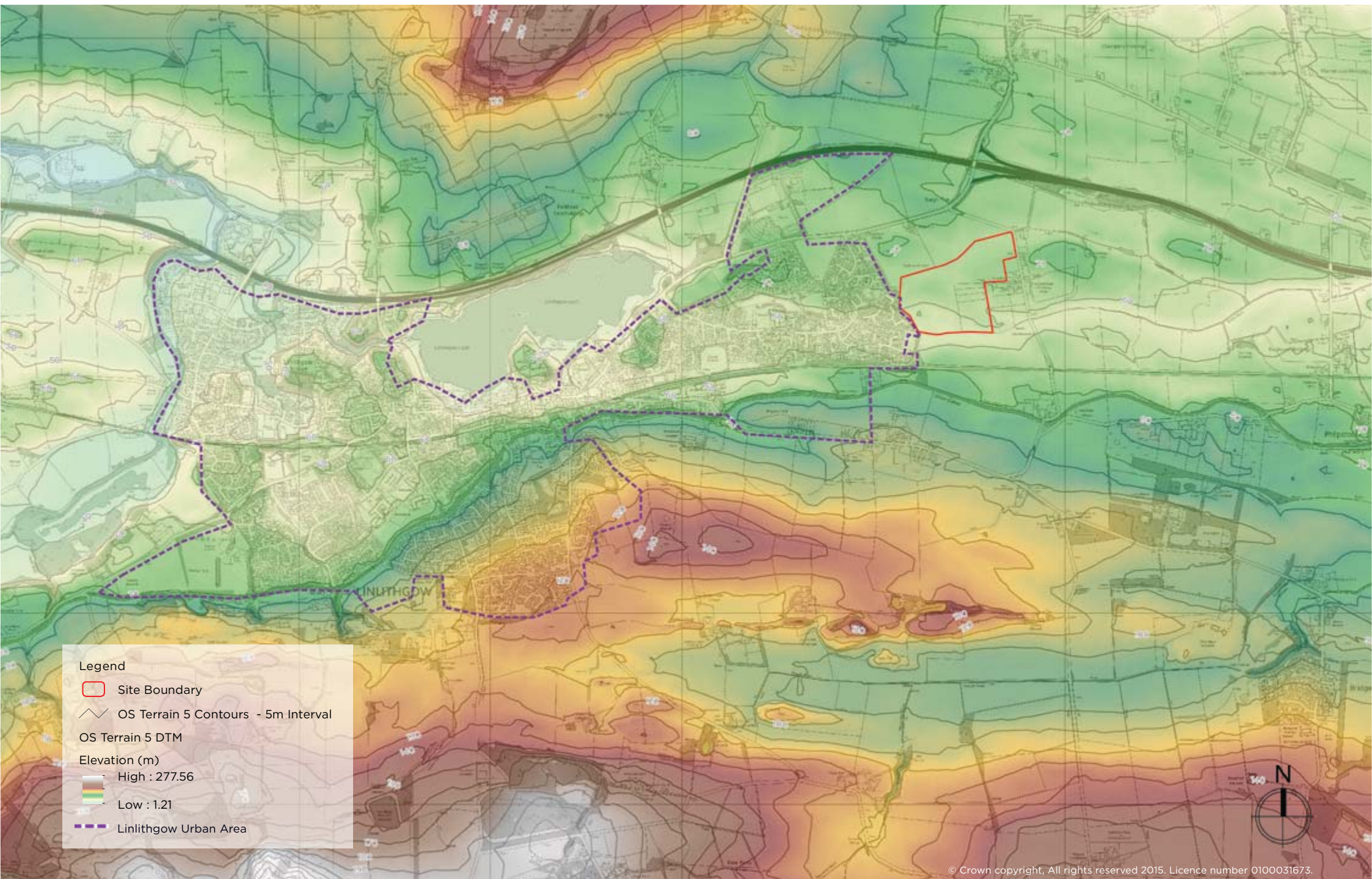


fig. 10 : Kingsfield Site in context with surrounding Topography

### 3.3 Current approach to growth

The LDP identifies a number of land releases around Linlithgow; these were anticipated by the landscape study which informed the location of the revisions to the previous Area of Great Landscape Value into the Proposed Special Landscape Areas and the alignment of the SLA was drawn accordingly.

The release of sites lifts the previous restraint to new development at Linlithgow and Linlithgow Bridge. Some of the proposed development sites are infill however most are on smaller sites on the urban edge; there is no larger strategic strategy mainly in response to the historic context. All development around Linlithgow is problematic, whether on rising land, adjacent to historic features such as the Canal, next to the railway line, within the Conservation Area or constrained by difficult junctions arising from the crossing of the Canal and railway line through the town.

Land releases can be compared by reviewing the adopted Plan next to the MIR and the LDP (Figure 09). New allocations and revised policy protection now create a constricted edge to the settlement with no indication of what the future of the settlement area should be and how it would sit within the hierarchy of West Lothian settlements.



Falkirk Council Area



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

# 4. Growth Analysis

## 4.1 Landscape Setting

Linlithgow follows an east-west orientation, stemming from the form of the original High Street, but one which logically has worked with the existing topography. This is clearly evidenced when looking at the wider topography analysis where Linlithgow has grown within the shallow valley floor and has been contained by the higher ground to either side of the valley. The exception of this is development to the south of Linlithgow which has breached the natural boundary and sits significantly higher than the rest of the town. The elevation of the town averages between 50 and 60m AOD, with some at 70m AOD and the southern edge rising between 70 and 120m AOD.

Linlithgow is set within a high quality landscape setting, much of it being historically a policy landscape. This landscape quality is recognised by the (proposed) Special Landscape Area (SLA) status. This will replace the previous designation of Area of Great Landscape Value (AGLV); the boundaries were reviewed in June 2013 within a report made by LUC for the Council. Whilst some land was removed from the AGLV designation other land was added as part of the SLA. Both are shown on the Designations Plan, Figure 08. Hence, SLA status is now contiguous with the settlement boundary around the south and south-east of Linlithgow (the Bathgate Hills Special Landscape Area) and along the northern boundary of the town (the Airngarth Hill Special Landscape Area). Airngarth Hill follows the M9, the northern settlement boundary and the southern edge of Linlithgow Loch.

The Bathgate Hills SLA is designated because it “comprise[s] a recognisable range of rounded hills, rocky crags and valleys, with a distinct West Lothian sense of place”, secondly because of the strong relationship between the landscape and the neighbouring settlements, and also for the essential recreational resource the area offers.

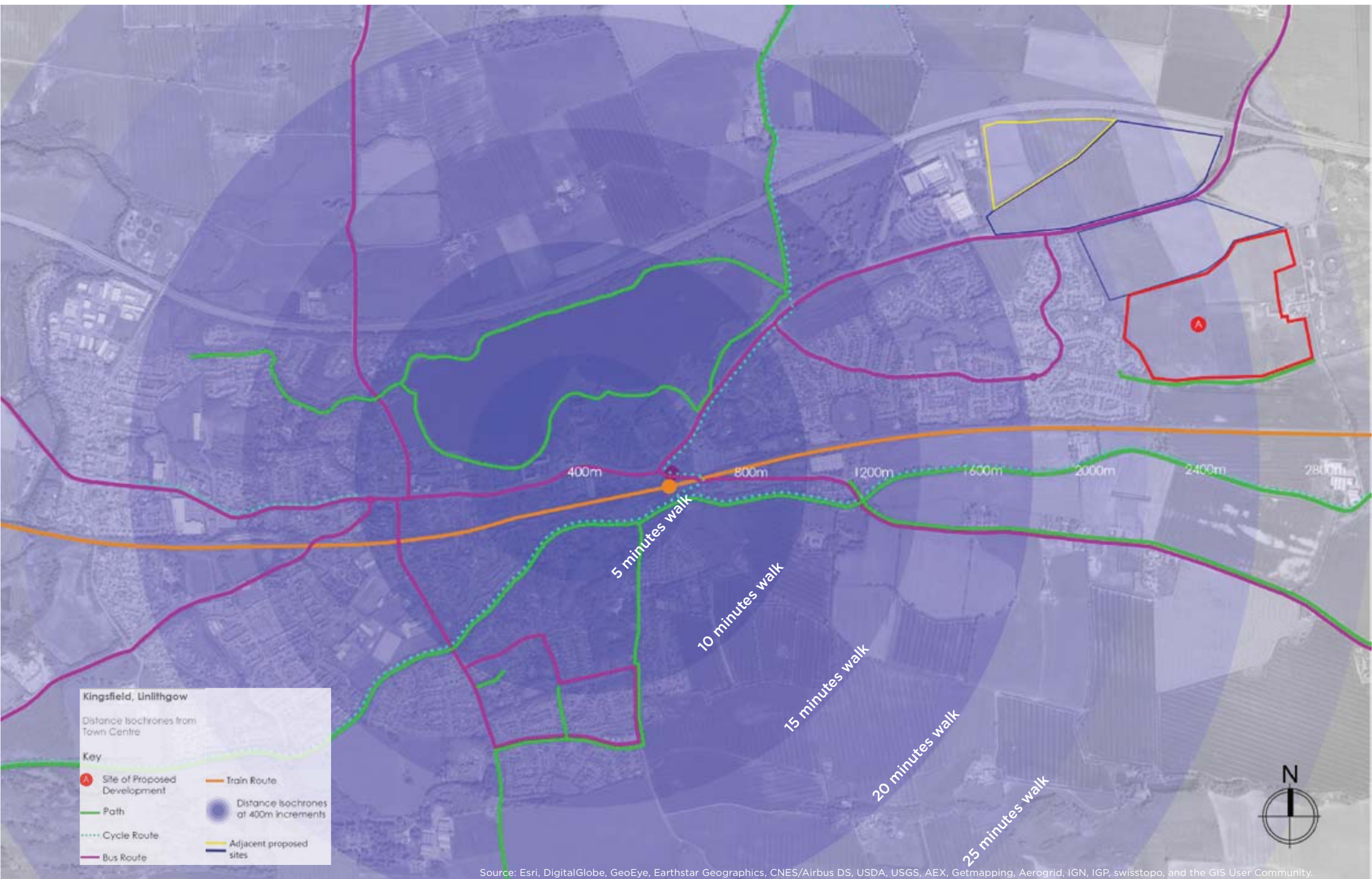
Airngarth Hills is recognised as being important in offering a backdrop to Linlithgow Palace and St Michaels Church, the Peel and the Loch. The higher parts of the SLA offer “spectacular views” and the area is important for recreation.

## 4.2 Options for Growth

Options for the future growth of Linlithgow, beyond the current proposed allocations, are limited. The reviewed SLA boundary forms a tight edge to the urban area for a significant length of its extent. This is further reinforced within the south-west by the presence of the Historic Battlefield designation, covering the site of the Battle of Linlithgow Bridge.

To the west, growth is stopped by the Council boundary, which follows the western edge of Linlithgow. To the north growth is constrained by the M9, the Arngarth Hill SLA, and the loch – the latter is further protected by Scheduled Monument status. The presence of the main line railway, and the canal, also running through the shallow valley within an east-west alignment further complicates matters. Whilst not prohibitive to development, the canal is a Scheduled Monument and will require special design consideration within its vicinity plus a setback for development, and whilst traditionally the railway has jostled with the urban townscape in Linlithgow centre, contemporary noise consideration would require more of a setback which does not promote connected urban form. These aspects are highlighted within the Growth Analysis Diagram, Figure 11.

This only leaves one logical area for the future growth of Linlithgow and that's to the east of the town within the area known as Burghmuir and around Kingsfield. Within the proposed plan, this area has been allocated as “Proposed Countryside Belt”, a new designation which was not on the adopted Local Plan of 2009 nor part of the discussion topics within the Main Issues Report of 2014. This is discussed further below.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

fig. 12 : Distances and walking times from town centre

### 4.3 Recent decisions concerning east Linlithgow

The Council view of developing the land to the east has been clarified through the Strategic Environmental Assessment (SEA) paper accompanying the MIR and in response to the initial Call for Sites process, and which constitutes the Council's assessment of sites coming forward. Also, the site to the north of Kingsfield - at Burghmuir- went to appeal in 2014 and the findings were published in 2015, expressing the views of the Council and the Reporter.

Common aspects for which east Linlithgow has been rejected, on landscape and design grounds, as an option for growth are:

- Poor relationship with existing townscape;
- Effect of extending Linlithgow to the east;
- Changing the character to the east and arrival at Linlithgow;
- Limited opportunity for connection with existing townscape and consequently an unsustainable distance from the town centre;
- Visibility;
- Resultant incongruous urban form.

The site assessment is based on a review of each the individual sites coming forward; the appeal decision was based on reviewing the application, assessing the site through a site visit and against national planning policy. Neither allows for a holistic look at where should Linlithgow grow next, accounting for the high quality of landscape afforded protection status, the traditional urban form and growth constraints including any physical features acting as barriers. If Linlithgow doesn't extend to the east, then it will impinge on these other aspects. Ultimately a balanced judgement has to be made and there will inevitably be issues arising from any of the potential future releases.

## 4.4 Countryside Belt and Settlement Setting

West Lothian Council has a policy called “Countryside Belt” within the adopted Local Plan of 2009. It covered land around Livingston, between Bathgate and Whitburn, and between Winchburgh and Broxburn. Its main purpose was to protect the settlements against urban sprawl, but to also provide opportunities for recreation and landscape enhancement.

There was no specific discussion paper on “Countryside Belts” within the MIR, nor was there any potential designation areas shown.

Within the Proposed Local Development Plan this designation is expanded to be “Countryside Belts and Settlement Settings”. The policy (ENV7) has been expanded to include East Calder/ Kirknewton and Linlithgow/ Philipstoun. The purpose of this is described as:

“Countryside Belts are spatial designations, and critical planning tools somewhat like statutory greenbelts around Scotland’s cities, for the purposes of controlling urban spread into the countryside. A key purpose is to maintain the identity of towns by avoiding coalescence. Protecting the setting of settlements is another important purpose of countryside belts”

However, the Council make it clear that the designation doesn’t reflect landscape quality.

The strategic purposes of Countryside Belts are to:

- maintain the separate identity and visual separation of settlements;
- protect the landscape setting of settlements;
- promote public access to green space for informal recreation;
- and enhance landscape and wildlife habitat.

The policy states that development will not be permitted within the Countryside Belts without satisfying a list of criteria. What the Council doesn’t do, however, is produce any background paper on why these areas have been selected, or the process that was undertaken to define boundaries. Reference is made within Policy Env1 to Supplementary Guidance ‘Landscape character and local landscape designations’ and ‘Green Networks’ which may provide some information however these don’t appear to have been published yet.

Regarding the purpose of the Countryside Belt as it affects east Linlithgow the following aspects should be considered:

- The edge of the proposed development area of Kingsfield is 1.65km away from Philipstoun; this requires detailed study but it is unlikely development in west Linlithgow would affect the visual identity of Philipstoun;
- As with any land release, development would affect the setting of the settlement however visibility to the site is not extensive: there would be views from Blackness Road, from the south-east edge of Linlithgow and glimpses from the minor route network;
- Public access is already promoted, and well-used, through the path south of the site boundary;
- The land area is currently low in wildlife value; it is grazed by horses and there are lost opportunities at the Errick Burn where there is only a limited riparian edge. Development doesn’t necessarily preclude improved biodiversity.

The Council have carried out two published landscape reviews since 2009.

The first of these is the West Lothian Local Landscape Designation review, which was prepared in June 2013 by LUC on behalf of the Council. The focus for this study was to:

“review the provision of local landscape designations in West Lothian, and to carry out an evaluation of the West Lothian landscape, leading to a new, more robustly justified single tier of Special Landscape Areas”.

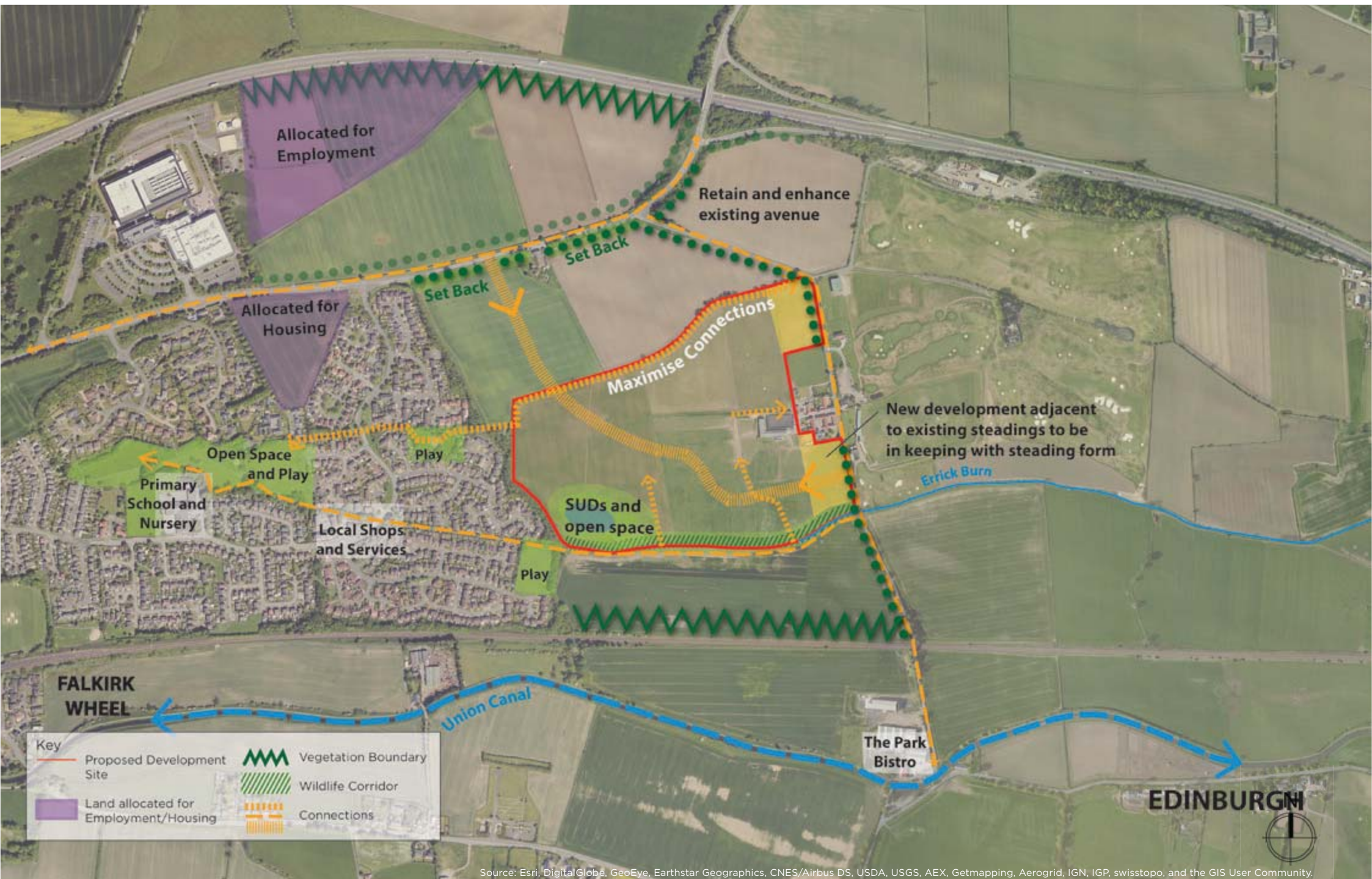
The study does make reference to the other landscape Council policies but when referring to the Countryside Belt policy states:

“The local plan contains other policies which relate to protection of landscape and countryside such as for Countryside Belts and Areas of Special Agricultural Importance. These policies are of relevance to the LLDR, although the review does not make recommendations on these other types of designations.... These will be reviewed separately by the council through the Local Development Plan process.”

What is worth noting about the study however, is that it took previous Landscape Character Assessment work as its baseline and divided the area up into landscape units, based on a refinement of those previous studies. The fringes of Linlithgow were named Landscape Unit Type 20 and this was assessed for suitability in inclusion of the new Landscape Special Area status. Following analysis, the areas within the west and south of the unit were considered to be the most important part of it and were included within the revised LSA boundaries. The eastern half of the unit wasn't considered for inclusion, and isn't analysed to any degree within the text.

The second document concerning landscape was prepared by the Council “West Lothian Landscape Character Classification”, produced in June 2014 as a background paper to the MIR. One of the reasons the Council publish it is because “development planning requires it to be taken forward as an independent document to support the LLDR [Local Landscape Designations Review] as part

of the Local Development Plan process.” The document is a record of changes to the Landscape Character Units made to the original Landscape Character Assessment of 1998, with updates due to the LUC Report and a report on wind capacity in 2011. It reports on the Landscape Character Type of which Linlithgow is in the Lowland Hill fringe within the unit “Linlithgow Fringes”. The key characteristics of each unit are outlined but not extrapolated to reach any conclusions as to what this might mean for LDP policy.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.

## 4.5 Conclusions

- Linlithgow has traditionally been an east-west orientated town. Options for future growth have now been made extremely limited through the proposed policies within the proposed LDP; something will have to be sacrificed if Linlithgow is to grow beyond the current identified land releases. This will either be the Special Landscape Area or the Countryside Belt, and whether or not the urban form changes and encroaches on the valley edges. Either way, the landscape setting of Linlithgow will be affected;
- How this balance should be made is impossible to determine without the evidence of how the Council established an analysis of the landscape area around Linlithgow and applied it to the Countryside Belt setting;
- There has been no transparency in the process of applying the Countryside Belt policy, with it suddenly appearing at the very final stages of the LDP process;
- Whilst the east of Linlithgow is Prime Land this is a common characteristic of all the land around the settlement edge (refer to section 2.0 of this report);
- Growth will always bring landscape change; all development land release will bring the edge of Linlithgow further into the countryside and increasingly removed from the town centre (see attached isochrone, Figure 12). An option for the Council would be to accept that the east of the town is the logical growth area and to be proactive rather than reactive, through establishing a future development framework for the area that contains principles which mitigate against the negative aspects identified within the SEA (a typical start to this process is illustrated within the “Growth Principles Diagram”);
- It should be accepted that Linlithgow will grow, and that the Council considers now what an expanded settlement might be in the future, what it needs to flourish, and how it should be defined. Best practice would suggest that this is a process that should start now.



# 5. Kingsfield

## 5.1 Urban Context

The previous sections accept that the site is on the edge of Linlithgow and will require care in ensuring that it can integrate with the existing settlement. Within the context that east Linlithgow offers the logical growth for future growth and this should be masterplanned following a development framework for the wider area, Kingsfield offers good development potential. The site is relatively flat, has the benefit of an existing good footpath link to the town and to local services, has very few site features and is close to a number of facilities. Living at Kingsfield could be a highly attractive alternative to town centre living, with easy access to a local school, local shop, dental services, golf and leisure including a café just a walk across the road, a bistro on the canal just 15 minutes' walk away and path and cycle networks within easy access as well as a connection to the M9 that avoids impacting on the town centre.

Kingsfield could be developed in isolation but it would logically relate best to the Burghmuir site to the north allowing shared principles on frontage design, open space, pedestrian and vehicular access to be developed together.



Local facilities (less than 5 minutes)



Access to local shops (15-20 minutes walk)



Close proximity to the Union Canal (less than 15 minutes walk)



Access to path network (less than 5 minutes)



Legible urban form designed to naturally slow speeds



A mix of typologies

## 5.2 Design Principles

### Spatial Experience

The site currently consists of an open field and therefore the development layout should be arranged to respond to existing urban forms around the boundaries, landscape features including topography, and the emerging proposals for the land to the north.

A hierarchy of different streets and spaces will create a varied and legible urban form. This basic structure can then be further articulated by additional requirements and guidance such as building height, landmarks and building typology as design progresses. It would be logical to adopt a different typology along the eastern edge, adjacent to the steading conversion, to that within the heart of the site which should respond to the Springfield development to the west.

Whilst views toward the east of the site are limited, trees should line the eastern boundary in order to provide a semi-rural leafy edge and separation from Kingsfield Leisure. A Landscape Appraisal analysing the separation between Linlithgow and Philipstoun may further refine the design principles along this edge.

Connectivity is further discussed within the section below; linkages into the site should be as many as possible in order to maximise integration and allow easy orientation around and access to the adjacent facilities. This includes the Leisure/ Golf development across the road, the Park Bistro to the south, the footpath network into central Linlithgow and to local facilities, and the cycle network along the Union Canal. Two access points to the site are shown from the minor road to the east and two possible access points from the site to the north allowing movement choice in access to the strategic Blackness Road.

Design principles are shown on the following diagram.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.



Social interaction through spatial design



Enhanced biodiversity



Additional play



Existing nearby links

## Landscape Strategy

The landscape setting, relationship with the existing town and emerging proposals for the site to the north have been the key influence in defining the principles for the development area, the urban form and location of open space. Particularly on an edge of settlement site, well-designed public open space will help establish a strong sense of identity, create opportunities for social interaction and promote healthy active lifestyles. It will continue the necklace of open space and intervention such as the school, the play areas, playing fields and shops that exist already on the attractive, leafy existing development to the west.

The landscape strategy for Kingsfield therefore has three key aims, first to ensure that this site is sensitively set within the surroundings and secondly to provide a resource for the new expanded community. The third is to respond to the issues regarding approach to Linlithgow and mitigate any issues and enhance opportunities.

A landscape framework for Kingsfield should therefore be designed to achieve the following:

- Provide a coherent edge to the expanded settlement creating a defensible long term boundary;
- Respond to views back to Linlithgow from the north, south and east, ensuring development is sensitively sited within a robust landscape structure;
- Enable the creation of an attractive character to the approach from the M9, which is an elevated view that will take in the site even if not directly adjacent to the access road;
- Provide new useable open space for the community;
- Provide a landscape structure that will protect the amenity of adjacent properties at Kingsfield Farm and the steadings;
- Provide a variety of meaningful and publicly accessible spaces to complement those existing within the established western edge of Linlithgow, those proposed within the Burghmuir site to the north, and that can encompass SUDS, amenity, play facilities and enhance biodiversity.

## 5.3 Connectivity

The emerging West Lothian Local Development Plan is supported by a range of documents, two of which are of particular interest in relation to the site at Kingsfield.

Firstly, the Transport Appraisal contains within it a model report dated 29th August 2014 prepared by SYSTRA. This report tested (scenario 4a) an eastern expansion of Linlithgow and concluded that “The road network can broadly accommodate the extra traffic associated with background traffic growth and development traffic. However, specific and local issues do exist in terms of increased journey times, delays and queues.” Further work was carried out by SYSTRA in an updated report dated 9th July 2015 and this report also included traffic testing looking at the incorporation of West Facing Slip roads at Junction 3 of the M9. The report concluded that “The results in the previous section suggest that there are enhancements within the performance of the network; the M9 West Facing Slips gives further improvements, but residual capacity issues remain.” These residual issues apply at junctions within Linlithgow and the location of Kingsfield in the east of the town in close proximity to the M9 illustrates that traffic impacts arising from the development would be largely diverted away from Linlithgow. That is particularly the case if the West Facing Slips are pursued.

The second document (the Action Plan) essentially carries on from the first and this notes at page 9, in relation to developments in Linlithgow and Linlithgow Bridge, the provision of the M9 J3 westbound slips. The Plan indicates that provision of the slips is at ‘Proposal Stage’ and that the responsibility for their provision falls to Transport Scotland and ‘the developer’. Development of land at Kingsfield would therefore be anticipated to contribute towards the provision of this infrastructure.

Considering the site itself in accordance with the nationally established hierarchy of travel modes then the following points can be made;

- The site would be permeable to pedestrian movement, particularly if developed in tandem with the site to the north which fronts onto Blackness Road. An existing lit / surfaced multi user path leads directly westwards from Springfield Road (travelling north of Bailielands / south of Sherrifs Park) affording a connection opportunity eastwards to connect with existing local shopping in Springfield and Springfield Primary School.
- The A803 passing to the north of the site (Blackness Road) currently serves as a bus route, albeit with limited services. Provision of the Action Plan item on page 9 (Coach park and ride facility at junction 3 / M9) would bring additional services into the East Linlithgow area plus additional local services are accessible directly west of the site within Springfield, reachable by using the multi user path noted above.
- Lastly, in relation to private car, the site is able to be accessed from several points. Most obviously, the site would be accessible through the adjacent site lying to the north which would, in turn, afford a connection to Blackness Road. However, at least one, preferably two, secondary access points are available close to Kingsfield Steadings and development of the site to the north in tandem with Kingsfield would thereby enable greater consideration to be given to a connected network of streets, designed in accordance with Designing Streets, to make for a permeable street layout serving the wider site area.



Active Links



Address streets and spaces



Multi user path to town centre

The overarching principles for an access strategy for Kingsfield would therefore be as follows:

- Promote pedestrian links to the west and to the north of the site;
- Improve the quality of the existing path on the southern side of the site, allowing accessibility for all abilities;
- Promote pedestrian connections to existing bus stops within the Springfield area to the west, and north on Blackness Road;
- Promote pedestrian connections to local leisure and community facilities;
- Promote integration with surrounding community;
- Ensure development overlooks and addresses open space;
- Develop a clear street hierarchy supporting a permeable block structure.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.



# 6. Summary

In response to the West Lothian Council Proposed Local Development Plan, this document seeks to support the view that:

- It would be prudent to plan for the future growth of Linlithgow now, and be proactive rather than reactive in order to ensure the best possible masterplanning to come forward;
- All land around Linlithgow is constrained through policy; the conclusions of this document are that the Countryside Belt should be objected to on grounds that the Council has not been transparent in its process, and has not allowed for adequate consultation;
- On the basis that the SLA status exceeds Countryside Belt, and that the best urban form will continue the historic precedent along lower, more easily developed landform then east Linlithgow offers the best possible future option for growth;
- appropriate development at Kingsfield can be accommodated within the sensitive landscape setting of Linlithgow and addressing the parameters identified within the MIR of 2014;
- Further, this document establishes how development at Kingsfield could make a positive contribution to enjoyable living and housing choice within Linlithgow.

The site at Kingsfield has the capacity to accommodate circa 350 new homes which will help to address future housing provision identified within SESplan for the city and surrounding regions. A development this capacity will allow flexibility for the creation of an attractive and distinct urban form, responding positively to the surrounding area. A variety of house types will offer housing choice for different sections of the community, including affordable housing; therefore, providing real opportunity for proper future sustainable growth of the town.



optimised environments ltd.

**Edinburgh**

2nd Floor | Quatermile Two | 2 Lister Square | EH3 9GL  
t 0131 221 5920 | w [optimisedenvironments.com](https://www.optimisedenvironments.com)

**London**

175 - 185 Gray's Inn Road | London | WC1X 8UE  
t 020 7812 0621 | w [optimisedenvironments.com](https://www.optimisedenvironments.com)

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Optimised Environments Ltd. Registered in Scotland SC359690.  
Registered address: 2nd Floor | Quatermile Two | 2 Lister Square | EH3 9GL