

WL/LDP/PP/0279

November 17th, 2015

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

West Lothian Local Development Plan

Objections to the Proposed Plan for Preston Farm Field, Linlithgow site ref. H-LL 12

Please note that this is the first time we have made a written representation on the Proposed Plan and that we are making this submission as individuals representing our own views.

Dear Sir/Madam:

We object to the current proposals for Preston Farm Field as follows.

1. Landscape

This site is included within the currently designated Area of Great Landscape Value (AGLV) and as such should not be rezoned as a site for housing. It is important that this land is retained in its existing rural form to

- Prevent the spread of urban development encroaching on the setting of the Bathgate hills
- Maintain the setting of Preston House (Grade A listed building)
- Stop the urbanization of the south side of the Union Canal (Scheduled Monument)

The development of this site will have a seriously detrimental effect on the town's setting within the rural landscape and its relationship to Cockleroy Hill. Due to the site's steep slope to the North West the site is particularly visible when approaching the town from the West. From the approaches to Linlithgow, the site presents itself as a wide expanse of rural countryside, separating the mature deciduous tree belt, visually at the foot of Cockleroy from the town. See photographs.

Site at Preston Farm



View of site taken from the east bound layby on the A803

Proposed site



View approaching Linlithgow Bridge on the A803

Another area of concern is the effect the development of this field would have on Preston House (Grade A Listed Building). Preston House is a country house in a rural setting. The reduction of the proposed site from that shown in the Main Issues Report is an inept attempt to address this issue. The development will still destroy the rural setting of Preston House when viewed from the North West, particularly from the Grade B listed Katie Shaws Bridge. The close proximity of housing and access roads close will urbanize the house's setting. A further concern is that the remaining field, approximately half its original size, complicated in shape, with a reservoir in the middle, is unlikely to be viable for its current use, the cultivation of arable crops, so will come under pressure for future development.

The effect of this development on the approaches to Linlithgow along the Union Canal are of great concern. This site is of prime importance since it gives the first rural setting to the west of the town after the long urbanized stretch from the town centre and provides the first views of Cockelroy. Development of this site would destroy these views both for the many people that walk and cycle along the towpath but also for the ever increasing numbers of visitors arriving by boat. Linlithgow is a primary mooring stop for holidaymakers narrow boating on the canal.

2. Traffic congestion

There are a number of serious issues with traffic congestion and road safety in Linlithgow that require to be addressed before any further major housing development is approved.

The problems with severe traffic congestion and the associated air pollution on the High Street have been identified for some time. Additional housing development can only exacerbate this. Development of housing at Preston Farm will increase traffic on the High Street as there is little option for car users if they wish to go east or west on the M9. West Port junction at the bottom of Preston Road and the roundabout immediately to the west already exceed capacity at peak times. Road traffic from additional housing at Preston Farm will directly feed into this junction further exacerbating an already severe problem.

Building new housing at Preston Farm will cause traffic and road safety problems on Preston Road. Both Preston Road and Manse Road take ever increasing through traffic from the Livingston area, particularly when people are going to and returning from work. Manse Road is severely restricted at the canal bridge. Preston Road is particularly congested at the beginning and end of the school day. The section of the road between the canal bridge and Braehead Road junction, is virtually impassable, due to parents parking either side of the road when delivering and collecting their children to and from the two primary schools. In addition, large numbers of pupils from the Academy cross Preston Road between the Braehead Road junction and the High Street. This is currently a major child safety problem, which further housing development at Preston Farm, will exacerbate.

The congestion in the High Street and Preston Road must be resolved prior to any further development being sanctioned. Solutions to these issues, such as a west bound slip road at the Burghmuir Roundabout on the M9, are likely to be very expensive. As the Preston Farm development is unlikely to generate sufficient finance through "planning gain" to pay for this, Preston Farm should not be designated as a "Preferred Site for Development". It would seem more sensible to find development sites on the east side of the town which could access the M9 eastwards and have far less impact on town centre traffic and if a new westward slip road were to be constructed they would have even less impact on town centre traffic congestion. Development at Preston Farm is always going to have an impact on town centre traffic congestion.

3. Environment

There are a number of environmental issues which should have precluded the Preston Farm Field site from development.

This site scored poorly in the Council's Strategic Environmental Assessment (Section 10.0 Appendix 2B). In particular the site at Preston Farm Linlithgow fails 12 out of 23 assessment criteria for "significant adverse effects". This is the highest failure rate of all the sites proposed for housing for West Lothian in the Proposed Development Plan.

Sites such as at Preston Farm, where the Assessment concludes that development will have significant adverse effects on the environment, should not be proposed for development.

The effect on wildlife is of much concern. There are a number of legally protected species that will be adversely effected by the development of this site.

A Bat Conservation Trust worker's short-term survey in October 2015, shows unusually high late-season bat activity at the site, with Soprano Pipistrelle, Common Pipistrelle and Nattereri bats identified. The report concludes that the darkness of the site is key to the habits of Nattereri bats and that if the site is developed, the street lighting and the light from housing will have a detrimental effect. The report also points out that the area of the field close to the canal is most important for feeding and that the bats access the canal from the surrounding woods through the field. A route that would be severed if developed for housing. This is a very important site for bats. We have seen large numbers of bats above the field to the rear of our house.

Badgers are common in around this field. Scottish Badgers Operation Meles has indicated badger activity on and adjacent to the proposed site. The lower field is identified as a key transit zone for badgers accessing food. The field itself is identified as a key feeding ground which the proposed development will disturb. We frequently see evidence of badgers in our rear garden which is adjacent to the field.

In addition to protected species there is an abundance of other species which are likely to be adversely effected by the development of this site. Greater Spotted Woodpecker, Kestrel, Swallow, Grey Partridge, Mallard, Moorhen, Sparrow Hawk, Swift, House Martin, Fieldfare, Redwing, Pheasant, Roe Deer, Rabbits and Red Fox amongst others have identified.

4. Agriculture

The Preston Farm Field site is classified as Prime Agricultural Land grade 3.1 and has been planted with arable crops every year in the 24 years we have lived adjacent to it. Building on this type of land is undesirable because we need to protect agricultural soils for future food production. Sites on prime agricultural land should only be developed as an absolute last resort when there are no alternatives. There are many brown field sites throughout the Authority which are of little use for agriculture and would be improved through their development. As stated earlier, the area of the field not proposed for development is small and irregularly shaped and has a reservoir in the middle. It is unlikely that the remaining field would be viable for arable crops so in effect would be lost as prime agricultural land for the production of cereals.

The Council has already approved vast areas within the Authority for housing development through its programme of CDAs. These developments will satisfy much of the overall need for new housing in the West Lothian. We should not be encouraging further development on prime agricultural land, by rezoning it for development.

Yours faithfully,



Alan and Fiona Edwards