

From: [REDACTED]
To: [wlldp](#)
Cc: [REDACTED]
Subject: Objections to the proposed West Lothian Local Development Plan
Date: 22 November 2015 23:47:26
Attachments: [Air Quality.png](#)
[Lorry1.png](#)
[Lorry2.png](#)

To Whom it May Concern,

I am a resident in Linlithgow and would like to raise several issues in relation to the proposed new Local Development Plan. I shall highlight quotes from the LDP & MIR in red below, and follow up with our comments on each point.

5.241 Air quality in central Linlithgow has been and continues to be a significant source of concern. The problems are principally associated with high volumes of stop- start traffic in the High Street, which in most cases has no alternative practical east- west route. The combination of peripheral housing developments and major retail and education facilities outwith the centre of the town give rise to a significant volume of cross-town short distance car use. Short distance journeys are disproportionately polluting. Further development which generates additional traffic in Linlithgow High Street and Low Port can be expected to worsen air quality. Air quality in Linlithgow High Street is currently being monitored and a statutory 'Detailed Assessment' is currently being carried out. Early indications are that an Air Quality Management Area will be recommended and if declared, it is anticipated that an Air Quality Management Area would be for PM10 and potentially also for NO2.

Air Quality Scotland state that within Scotland the concentration for PM10 Particles Objective should be that **50 $\mu\text{g m}^{-3}$, not to be exceeded more than 7 times a year**. As you will see from the graph attached, between 09/11/2014 & 09/11/2015 this figure was exceeded at least 24 times - on February 02 2015 it reached a frightening **116 $\mu\text{g m}^{-3}$** . We have approximately 16 thousand cars travelling the length of our high street every day, and our children walk here. This is not a healthy town centre, and cannot support any further increase in traffic through the high street. No development in the town should be considered prior to the situation with Air Quality being rectified.

Enter the custom date range to view data for:

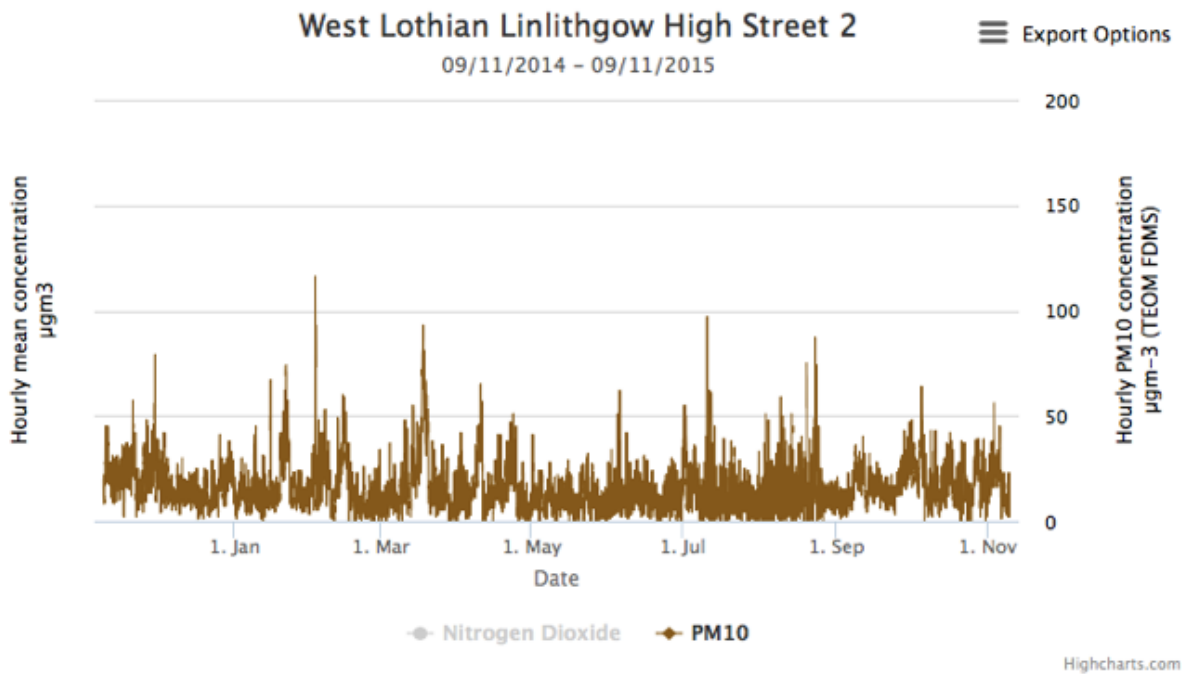
From (dd/mm/yyyy)

09/11/2014

To (dd/mm/yyyy)

09/11/2015

Update graph



5.51 To achieve this, LDPs are required to allocate suitable land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of plan adoption, ensuring a minimum of 5 years effective land supply at all times. 'Effective' means that sites are free, or expected to be free, of development constraints in the period under consideration, and will therefore be available for the construction of housing. Planning Advice Note 2/2010 'Affordable Housing and Housing Land Audits' provides details on matters to be taken into account in the determination of effective housing land and SESplan has separately set out a common approach to the measurement of the five year land supply in a paper entitled Maintaining a Five Year Effective Housing Land Supply (18 May 2015) which the council endorses and supports."

The sites suggested in the proposed plan are not free of development constraints - there are significant constraints in the Education provision within the town. As it stands our schools are currently refusing places to people moving into catchment (Low Port Primary has recently had to do this). We live in an area of family homes dating back to the 60's and 70's, where over the next 10 years the original occupants of these homes are likely to downsize, freeing up family homes for a catchment area which is already at capacity. You propose 385 homes within the catchment of Low Port Primary School, however Low Port is unable to take kids within the catchment as it is. This will not be solved by the construction of Winchburgh Academy, and within the Local Development Plan there is no plan in place for a new Primary School for the town. Low Port Primary would need to double in size to accommodate the numbers of children these developments would house. No plans are included within the LDP for an extension, or for an extension to Springfield which would also be required if the catchments were split. **According to Q6 Vision Statement Infrastructure Requirements and delivery (p9) Developer Proposals should be refused until that infrastructure has been defined and is in place.** The means that any plans for the development of the town are premature until education can be provided for all.

Safe Route to schools.

As residents in [REDACTED], with children at Low Port Primary we are all too aware of the safety (or lack there of) of our current route to the school. Our beautiful Canal Bridge is unsafe. The transport assessments previously carried out DO NOT reflect user experience. A child's buggy has been hit by a van recently on the bridge (Police incident number PS20151030-539 30/10/15) and we regularly have to dodge traffic mounting the kerb next to us. Our children walk down a pavement to school that due to it's angle as cars turn down the hill past it, their front bonnets overlap the kerb edge - all it takes is for a wheel arch to catch a school bag strap, and we're in serious trouble). The angle of the pavement is a hazard during icy conditions with children slipping out onto the road (at the junction of Back Station Road & Strawberry Bank). We have not been provided with a safe route to schools as it is, and this will only worsen with further development in the Manse Road area. I have attached below a photograph of the sort of issues we regularly deal with at the bridge. In the photograph you can see how close children are to the trapped lorry. In addition to the situation on the bridge, underneath the bridge is a hazard due to damage from vehicles and the potential for falling masonry.





Further to this issue, I raise the volume of traffic and queues at High Port and Back Station Road blocking the road under the rail bridge. Blackness Road has traffic queues in rush hour, outside a school which operates an Afterschool Club until 6pm, with children crossing at lights. The traffic is currently so bad that our high street has drastically exceeded the Scottish Air Quality Strategy maximum readings of PM10 as mentioned above. This is on our route to school - and is another reason the council fail to provide a safe route to school for Low Port Children. As a resident of [REDACTED] I can assure you that despite Low Port Primary being close by, many parents locally when running late, in bad weather, or with young children will resort to driving down the hill and parking in the Tesco carpark to drop kids off at school. The mitigation measures you suggest to rectify these issues will do nothing to solve them, and any extra homes you place in the town will exacerbate this further.

During my discussions with council representatives at the Consultation, they advised that access to the Clarendon development (HLL-10) would be via Clarendon Road, and not the access route mentioned in the LDP of via St Michaels Hospital Road. If you open up St Michaels Road and Clarendon Road for the Clarendon development you will turn Clarendon Road into a bypass and rat run endangering residents. Both options cross your SVL area which, according to your representatives is protected from development and could not happen. This makes Clarendon an impractical, intrusive and unsustainable development, contrary to your own plan guidance.

There are several errors within the proposed Local Development Plan:

P118 Does not feature on the map - this relates to new access to Clarendon Development. (pp90 of the plan) Why has this been omitted? Does this show St Michaels Hospital or Clarendon?

Development Ref: H-LL 3

50 Family Homes at Boghall within Springfield Catchment (incorrectly identified in the LDP as Low Port Primary... or is it?)

Development Ref: H-LL 7

8 Family Homes at Clarendon House within Low Port Catchment (incorrectly identified in the LDP as Linlithgow Bridge Primary)

Development Ref: H-LL 10

120 Family Homes at Clarendon Farm within Low Port Catchment (incorrectly identified in the LDP as Linlithgow Bridge Primary)

Development Ref: H-LL 11

200 Family Homes at Pilgrims Hill within Low Port Catchment (incorrectly identified in the LDP as Linlithgow Bridge Primary).

Development Ref H-LL 12

Prestonfields, within Linlithgow Primary Catchment (incorrectly identified as Linlithgow Bridge catchment)

Development Ref H-LL 5

BSW Timber within Linlithgow Primary Catchment (incorrectly identified as Linlithgow Bridge Catchment)

2.11 With regard to Linlithgow, in previous development plans the town has been designated an 'area of restraint'. Consideration will need to be given to a review of this policy position. If this position is to change development potential will be limited until a new secondary school has been built at Winchburgh which will provide for new capacity in the area.

The proposed Local Development Plan opening up land for development within the town is premature as this school has not been completed as yet, and planning permission not yet applied for.

3.82 The Linlithgow Area Local Plan of 1994 (LALP) identified a number of reasons why it was considered appropriate to restrain development in Linlithgow. These included:

the desire to preserve Linlithgow's small scale character and to safeguard its attractive landscape setting;
Has not changed.

recognition that traffic congestion was both a physical and environmental problem for the town, adversely affecting the ambience of the High Street and thus eroding its attractiveness as a tourist destination;
Has not changed.

appreciation that car parking had become increasingly difficult to find and that deliveries to shops and other commercial premises were awkward;
Has not changed.

concern that further large scale development, or the incremental effect of a number of small scale developments, would materially and negatively impact on the environmental capacity of Linlithgow's town centre generally;
Has not changed.

concern that further unrestricted development could upset the balance between the town's population and the provision of service and community facilities; and
Has not changed.

an awareness of there being significant capacity issues with the local schools.
Has not changed.

As a result of all of the points raised above, we do not believe the status of Linlithgow being an Area of Restraint should change, and no development of the town be

permitted until serious improvements to infrastructure have been completed.

Regards,

Sarah & Gerry McArdle

