



Registered Scottish Charity No: SC042123

Date: 21st November 2015

To: Development Planning & Environment Manager
West Lothian Council
Livingston
EH54 6FF

Transition Linlithgow objection response to West Lothian Council LDP, 20 November 2015

As a registered Scottish Charity dedicated to making Linlithgow a more sustainable place to live, Transition Linlithgow (TL) is supportive of West Lothian Council's aim to: *'help achieve climate change objectives by minimising the area's carbon footprint through promoting development in sustainable locations and supporting mitigation and adaptation measures'*. As per POLICY NRG 1 (Climate Change and Sustainability), the reduction of greenhouse gas emissions, The Climate Change (Scotland) Act 2009, and mitigation against climate change, ***must all serve as the strategic overarching principles when considering any development proposal.***

However after reviewing the proposed LDP, the following response highlights where we feel West Lothian Council (WL), are ill-prepared for mitigating against, and adapting to Climate Change. The response focuses on Linlithgow, though many of the points raised apply across the West Lothian region. Recommended alterations and key points to be included in the LDP are ***highlighted.***

AIR

As recognised in paragraph 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 stopstart 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..... Further development which generates additional traffic in Linlithgow High Street and Low Port can be expected to worsen air quality..... Early indications are that an Air Quality Management Area will be recommended for PM10 and potentially also for NO2'*.

Whilst recognising this known issue, ***the LDP must mandate transport impact assessments as part of the development planning process*** for the proposed peripherally located developments (housing and employment). This will ensure additional motor vehicle journeys, and in-turn likely impacts to air quality on the High Street/elsewhere in the 'Management Area' are established, so as informing the planning approvals process. It is also recommended ***when developing any air monitoring process, that PM2.5s are included as part of any measure/evaluation-set, as these particulates have worse impacts on public health.***

The LDP needs to state how air quality issues will be addressed. They can be addressed by the following package of traffic demand/behaviour management measures (to reduce additional traffic):

- **land-use planning in favour of centralised locations**, otherwise further developments away from the centre will further compound the significant volumes of short-distance car use. This is supported by POLICY EMG 4 Air Quality '*Development will not be supported where it is not possible to mitigate the adverse effects of that development on air quality effectively*'
- **provision of high quality/safe/direct walking and cycling routes** to encourage fewer short-distance journeys by car
- '*Development promoting behaviour change programmes to facilitate modal shift of shorter journeys to walking and cycling is supported in principle*' (POLICY EMG 4 Air Quality). **The LDP needs to demonstrate a stronger stance than supporting policies in principle, it must support** (i.e. Active Travel, especially with the advent of the 2015 Draft Active Travel Plan)
- **20mph speed limits** to encourage lower emissions through smoother vehicle flows/less accelerating and decelerating, whilst enabling a safer environment (attractive for greater levels of High St cycling)
- **robust/enforced parking restrictions** in the town centre to better control traffic coming into town (both numbers, vehicle flows -stop-start looking for spaces- and turning manoeuvres which impede road safety)
- **addressing the issue of bus layovers, whilst engines are left running**, on the High Street
- **bus interchanges** at the extents of the High Street where there is greater space (i.e. by Tesco, and by the Medical Practice), to lessen stop/starting along the High Street of these higher emission vehicles, whilst freeing up space on the High Street for improved town centre infrastructure, that also brings economic benefits i.e. wider footways, street furniture/plants (absorbing CO2), potential outdoor café/seating.

The Scottish Government's new Clean Air For Scotland (CAFS) identifies 5 years worth of strategy to combat air quality. 5 years which aligns with the timespan of the LDP. As such the LDP should be reviewed to align with the CAFS and to clearly define how Linlithgow will adapt to achieve full compliance with EU air quality legislation.

Due to the layout of Linlithgow and the historical design of the High Street and creeping development at the edge of town over decades, a crisis is looming. TL urge WLC to carefully design development zones which not only improve air quality but help it to meet the EU legislation limits on all particulates and NOX gases. The proposed developments within the LDP aligned with the higher than average car ownership ratios in Linlithgow will undoubtedly have a net increase the 16,000 cars per day that already saturate and dominate our High St and thus making air quality a critical design consideration. Looking at the town's infrastructure, it is predominantly biased to the east of the town centre bottleneck. (the leisure centre, academy, primary schools, large retail parks, industrial estate, council CRC, etc) and as such it makes sense to consider the pressure that would be placed on town centre air quality by biasing new housing development to the east. This traffic has no alternative and must use the High St to access these services. The LDP does not appear to give any consideration of the types of travel journeys and destinations and to align those with the impacts of new developments.

WATER

Linlithgow Loch water quality is a key concern, with it now categorised as Hyper-eutrophic. Also, '*Linlithgow is a priority area for surface water management due to significant flood risk, exacerbated by steep topography, limited capacity in the drainage system and water quality in Linlithgow Loch.... Developers will be expected to invest to take account of these interrelated issues to better the situation*' (page 200).

As part of adapting to Climate Change, there is a need to plan for resolving and managing risks associated with increased storms, and flash flooding events. Logical early interventions should

include scrutiny of development proposals in water catchment areas. Where due diligence has been undertaken, and proposals are granted, then there should be robust oversight of Sustainable Drainage policies NRG1 (treating and conserving water on site) and EMG 3 (Drainage Impact Assessment – DIAs). **As part of EMG3, it should be explicitly stated that DIA's must be undertaken, when proposals are planned in locations that already have known water quality/drainage concerns.**

Water quality and drainage concerns identified in the LDP relate to numerous proposed (Linlithgow) developments: H-LL-3 / 4 / 5 / 7 / 10 / 11, E-LI 1 / 2 / 3, and P43. Due to a lack of evidence regarding the source of each pollution type impacting Linlithgow Loch, **the LDP should state that there will be a presumption to delay any development in the Loch's catchment area until the consequences (pollution, and drainage) of adding more development sites are fully evaluated and understood.**

SOIL

TL is deeply concerned about the sustainability & security of future food supplies across Scotland, and the need to protect Prime Agricultural Soils in WL and around Linlithgow.

POLICY ENV 4 'Development will not be permitted where it results in the permanent loss of prime agricultural land' only addresses this concern in-part, however. Where agricultural land is not formally identified as 'prime', **all efforts should be made to avoid using arable land for housing or employment sites.** This better ensures the food security, resilience and sustainability of WL, and Scotland.

As per POLICY ENV 7, and paragraph 5.140, the Countryside Belt has been a key planning policy mechanism for several decades, which has ensured protection of rural land by helping to (amongst other things) encourage regeneration, manage urban growth and protect important areas of local biodiversity, woodland etc. by focusing development towards urban areas. '*Within designated Countryside Belts, development will not be permitted unless there is a specific locational need which cannot be met elsewhere and need for incursion into Countryside Belt can be demonstrated*'.

It is evident that this policy is no longer robust, especially due to development proposal P43 (Burghmuir High Amenity employment site), sited within Linlithgow's defined Countryside Belt. P43 also does not fulfil the requirements that form the basis of Policy DES1: accessibility, active travel, air/water quality. It is felt more can be done to explore alternative brownfield or central locations (see suggestions under 'land use'). This is also the case in determining an alternative location for site P45 (Coach Park and Ride facility), which could be considered closer to the town centre (drop off at a potential Tesco interchange, and by enlarging bus bays on Blackness Road – akin to bus use during Winchburgh Tunnel closure) to enable a more sustainable 'Park and Stride' approach. **TL objects to site P43 being located in the Countryside Belt, and also encourages an examination of alternative options prior to progressing site P45.**

Brownfield land (see also 'land use') **should always be prioritised over use of any form of agricultural land**, and the LDP should state as such, especially as redevelopment of brownfield sites are a key LDP aim. This is applicable to all developments, but especially so for large development proposals like site P43, and site H-LL 11. Due to the removal of a notable area of prime agricultural land, the peripheral nature of the location, **TL objects to development of site H-LL 11.**

When thorough strategic planning assessments have been undertaken to exhaust all potential locations, and no alternative exists but to progress development on (non-prime) agricultural land, then developers must fulfil the requirements of POLICY ENV 5 (Soil Sustainability Plans) and POLICY ENV 6 (Peatlands and carbon rich soils), and POLICY NRG1 (Sustainable design).

LAND USE PLANNING

Key LDP aims are:

- Ensure that appropriate brownfield sites are redeveloped....
- Promote the development and regeneration of town and village centres.

Brownfield sites should be explored first for accommodating any new developments. This also includes existing unused land or buildings that could be re-purposed. ***The LDP should effectively encourage re-development, maximisation, and re-use of existing properties and land.*** Linlithgow examples include:

- Stuart House, High Street - could be converted from offices to flats.
- Doomsdale - contaminated scrub land could accommodate housing.
- Sun/Oracle Campus – could be converted to housing or positioned as a centre for district heating plant.
- Land adjacent to the loch and behind St. Michael’s RC church (ex tennis courts), could be given planning support for social housing.
- Victoria Hall could be re-developed into town centre housing above retail units matching in with the rest of the conservation zone.
- Whisky Bond/adjacent land on Edinburgh Road – good land near rail station. Not ideal for HGVs as it stands. Could be re-located to other industrial sites in WL and re-use land for high-density flats and/or station parking capacity.
- CEMEX ex-quarry land at Kettilstoun is effectively brownfield, ex-industrial land and could be partially purposed for housing.

Significant potential exists within town centres, especially in-terms of retail, flats and other developments (as per paragraph 5.138). Ahead of considering new unsustainable locations on the periphery of the town, focus should first be given to town centre regeneration and the use of Brownfield or other unused sites (Victoria Halls being a case-in-point). ***The LDP should explicitly show, via a flow-chart at the outset, a hierarchy for considering new developments*** (i.e. at the top, centrally located, sustainable developments accessible by foot/bike/public transport, down through the variants to, peripheral locations served by public transport).

Policy DES1 places onus on the developer to ensure proposals that are accessible, and do not impact on the water environment, or water quality. This onus is misguided as the primary development onus must fall on WL Council, as planning authority, to ensure sustainable development locations first-and-foremost, ahead of then regulating and overseeing developers (as per Policy DES1), in ensuring developments which are easy and attractive to access sustainably, and which do not impact upon air quality, or the water environment. ***As part of DES1 (or by linking to a preceding policy – potentially informed by the chart prescribed above), responsibility must first be assigned to the Planning authority.***

TRANSPORT

Relevant LDP aims are:

- Without the necessary infrastructure requirements having been satisfactorily addressed the council will be unable to support development proposals.
- Provide an improved network of linked open spaces incorporating active travel routes.

Sustainable transport is also supported by POLICY NRG1 (sustainable land use), POLICY TRAN 1 (Transport Infrastructure, Policy) and POLICY TRAN 3 (Core Paths and Active Travel), and the 2015 draft West Lothian Council Active Travel Plan.

Apart from the canal, and the recent and most welcome towpath access improvements, there is currently limited safe cycling infrastructure in Linlithgow. The positive introduction of the Active Travel Plan for WL does not however provide a strategic network of cycle routes for each settlement in WL. **There is a need for strategic plans to identify core walking and cycling infrastructure within, and linking, settlements across WL.** Without such plans, numerous policies including NRG1 cannot be enacted.

Currently, the active travel infrastructure proposals indicated in the LDP for Linlithgow are piecemeal (P102, P18, P46), they do not indicate strategic linkages to Linlithgow town centre/other settlements, nor do they go nearly far enough to attempt mitigate the additional car journeys that will result from the numerous proposed developments on the periphery of the town: P43, H-LL 3 / 4 / 6 / 10 / 11 / 12. The LDP proposals continue to lend themselves to short-distance car use, due to peripheral/dispersed nature of the new proposals, and lack of sustainable transport infrastructure.

LDP proposals do not reflect the intentions of POLICY INF 1 Infrastructure Provision, or help address *'the critical infrastructure requirements for the plan area [that] relate to education and transport (including sustainable transport infrastructure)'* – paragraph 5.81. Paragraph 5.110 highlights that *'priority will be given to sustainable transport modes such as active travel, public transport and car share'* but that meeting the *'overall level of housing need and economic growth aspirations will have implications for the transport network'*. This is understandable, but it is not an excuse or a 'get-out' for the Council. **WL must give serious focus to POLICY NRG1 by 'integrating land use with sustainable transport approaches, through safeguarding and enhancing the network of sustainable forms of transport'** as a critical requirement to promoting sustainable economic growth.

There are poor/indirect/informal cycle connections in and out of Linlithgow, especially in serving Bo'ness, Livingston, and Whitecross. There is a need to have an east-west (serving the High St, as the canal caters more for leisure/non-commuting journeys) and north-south route across town, with both routes serving the High Street. **Much needs to be done on the High Street to tilt the balance to make it a safe and enjoyable place for people/shopping/community/business**, opposed to the current hostile environment where motor traffic is prioritised. Examples include addressing:

- No traffic management plan in-place for the town centre.
- No evident parking strategy: under utilised car parks; informal parking elsewhere resulting in disruptions to traffic flow (emissions/delay); lack of design of parking charges; no traffic warden presence therefore regular incidence of double and single yellow line parking.
- Limited adherence by drivers of the 20mph speed limit due to the illegible High St '20' speed roundels/signs (more promotion of the limit needed), and no enforcement/deterrent.
- No plans to improve local bus service and capacity for L1 or provision of a new bus service to serve Manse Road/Preston road.

Infrastructure proposal P-44, the continued safeguard of western slip roads at Junction 3 on the M9 at Linlithgow is welcomed, even though it compromises a small area of development on the Countryside Belt. This offers a significant potential benefit, especially if a western slip road serves each direction of travel on the M9, by diverting west-east and east-west traffic from passing along the High Street, as is currently the case for all vehicle journeys starting/ending in the eastern extent of the town. **Proposal P44 offers significant potential to reducing the amount of traffic and emissions along the High Street, however, it cannot be viewed in isolation as the panacea to cutting emissions** (see above for a package of complimentary measures).

Collectively the above measures will help to re-balance priorities, and significantly contribute to reducing single occupancy car trips, promoting the use of sustainable forms of transport, addressing

air quality issues (High St), reducing greenhouse gas emissions, while also helping towards achieving the Scottish Government-set modal shift target of 10% of all journeys by bike by 2020.

ENERGY/MINERALS/FORESTRY

While POLICY NRG 2 (Solar Roof Capacity Requirements) and POLICY NRG 5 (Energy and Heat Networks) are welcomed, there is no clear development plan or policy in the LDP that covers renewable energy provision for WL, for example, wind turbines, hydro schemes, or communal solar energy schemes. Similarly, no support is given for sustainable new technology opportunities including heat mapping, energy extraction from (deep geothermal, hot rock, Linlithgow Loch or other water courses, former coal mines), and development of district heating systems (linking industrial, educational heat demand with housing, public services etc.), while no clarity is provided on how national heat targets will be met at a local level.

TL would welcome a full heat mapping exercise to be completed for all residential and industrial zones across WL, and in particular for Linlithgow's specific heat energy needs to be fully considered before new development is zoned or approved for construction. Our town has a broad mix of buildings with many not capable of meeting tough EPC ratings. Focus on district heating within new development zones is to be welcomed but should be properly considered and load balanced with energy sources and uses within existing built environment. E.g. heat demand at leisure centre, schools, offices during the day/evening vs. domestic heat demand predominantly in the evenings.

The Scottish Gov's Heat Policy seeks that the nation "achieves 1.5 TWh of Scotland's heat demand to be delivered by district or communal heating and to have 40,000 homes connected by 2020" and "11% of that heat to come from renewables". There is no indication within the LDP on how West Lothian will contribute to that goal.

An aim of the LDP is 'Support the extraction and re-use of minerals where justified....'. ***TL are full opposed to any form of Coal Extraction, Fracking, or Underground Coal Gasification (UCG) across Scotland and specifically in WL.*** Coal is the worst form of carbon that could be extracted and used as a fossil fuel. ***TL request a moratorium on extraction of all coal, shale oils, and underground gas deposits.***

POLICY NRG1 covers 'protecting and enhancing land uses that act as 'carbon sinks' (for example extending woodland cover and protecting valued peat lands)' yet there is no specific mention in the LDP regarding re-forestation of land to balance the growing demand for timber, while also help to offset local air quality issues. ***The LDP should explicitly state support for the extension of woodland zone*** (i.e. Beecraigs), as this supports the critical need for more carbon sequestration.

--

To summarise, though the aims and much of the rhetoric of the LDP is agreeable, much of the detail is lacking and not supportive of achieving genuine sustainable development. ***In too many instance get-out terms are included as part of policy wording***, for example 'where appropriate' (9 policies, and 1 key aim), 'in principle' (10 policies). There is a clear case for human induced emissions contributing to global warming, and it is the responsibility of local authorities - through clear duties contained in the Climate Change Act ([section 44](#)) – to exercise its functions by acting in the best calculated way to contribute to delivery of the Act's emissions reduction targets, to deliver any statutory adaptation programme, and in a way considered most sustainable.

TL therefore *'objects'* to the LDP on the grounds of the content of our letter, and on the grounds that other than rhetoric, there is little evident consideration or action from WL to meaningfully tackle major contributors to climate change, or to develop sustainable development across the region that effectively and equally addresses economic, social and environmental criteria.

Listening to climate scientists and experts in sustainability, the world is at a critical point. CO2 is now at 400ppm and global average temperatures are now 1 Deg C higher than pre-industrial times. With approximately 500/600Gt of CO2 left to consume to limit warming to 2Deg C, WLC should be using their LDP to plan for a very very low-carbon future. One that can properly provide food security, energy optimisation, efficient housing, public health and wellbeing.

We have, according to leading experts, a monumental task for human society to become a zero carbon by approximately 2037/2040 and to contribute to reduce emissions in the western world by saving some 10% per annum on our emissions to achieve that target. Put it another way, that is just 3 or 4 iterations of WLC's LDP's to cycle through. Lets make each and every-one of them pioneering, bold and successful in meeting the aims of protecting the earth for generations to come.

Yours faithfully
and on behalf of the trustees and members of Transition Linlithgow.

Alan Brown
Chair
Transition Linlithgow