

21 November 2015

To: West Lothian Development Planning and Environment Manager
The Civic Centre
Almondvale
Howden South Road
Livingston
EH54 6FF

Ref: Notification of publican of proposed local development plan. Comments on H-LL 11 / Wilcoxholm Farm/Pilgrims Hill and on the overall Local Development Plan.

To whom it may concern,

Thank you for your notification of the proposals to support housing development on the above mentioned site and the LDP for Linlithgow as a whole.

I wish to register our **Objection** to this proposed plan on the following grounds:

H-LL 11

- 1. All of the land identified south of the railway line and north of classified as Grade 2.x Prime Agricultural Land. High grade soils capable of growing a broad range of food. Climate Change mitigation and National Food Security will require that we in Scotland, in the UK and many other countries around the world, need to become much more self-sufficient in food production and to rely much less on imported food from other regions, both because of the pollution from transportation but also in terms of the growing pressures on other countries to produce food for our consumption which puts stress on their local and natural water resources, on their soils and on their capacity to feed their own communities. The timescales for this transition in our food system can be measured in tens of years and easily within the lifetimes of the existing population and next generation. As such it is vital that WLC act responsibly and ethically and fully protect our prime agricultural soils at all costs and direct development to be on brownfield sites only. Once sealed, soils are lost for future generations and this is 'not' sustainable and goes against the core 'sustainability' aims of the council.
- 2. Any housing on this site would dramatically alter this area of high landscape value from one of open countryside to dense housing. This is a primary route into

Linlithgow's historic town centre and the Palace, St. Michael's Church and other profiles would be hidden behind rows of modern housing with no graduation of transition from urban to rural, thus spoiling the progressive transition currently afforded on all access routes into town.



3. The slope of land south of Pilgrims Hill to the south west of the site and bounded by is very steep and not conducive to development of any kind.



- 4. Infilling housing along ______ (on only one-side of the road) with a high elevation only would have a detrimental visual impact to a primary route into town. This could easily be interpreted as ribbon development which the council was previously against and documented in previous applications that have been rejected on ______. Supporting H-LL 11 seems to contradict existing policy on ribbon development which this development would give an illusion of.
- 5. Any housing south of the canal would need a footbridge constructed over the canal to provide safe routes to school and to the town centre, as the pavement at the canal bride is too narrow and dangerous for pedestrians. As it is, pedestrians feel unsafe walking and cycling through this tunnel when the traffic lights change and large vehicles pass at the same time.
- 6. We live on the Academy on a regular basis. The distances are too far for many and the steep

nature of discourages all but the fittest to walk or cycle. Most of this site would be too far from the town and other amenities on the east of the town (leisure, academy, recycling, etc) and as such the bias of travel will be by private car for all short trips. Wilcoxholm Farm site is too far from the town centre to encourage a modal shift to Active Travel.

- 7. Land east of Maidlands is frequently saturated in parts and may never be suitable for housing. Soil sealing from roads, gardens and rainwater runoff may exacerbate this flooding, and subsidence may occur in properties adjacent to the wet. Similar to the issues in Bailielands, properties may be damaged by construction on soft soils. SEPA maps also indicate that Climate Change and increased rainfall may make some of this land unsuitable for farming or development. Proper consideration should be given to flood risk areas. Canal flooding may also need consideration.
- 9. at the junction with Maidlands frequently floods and increases the risk of an accident as town / west bound traffic are forced onto the opposite side of the road at a tight bend. This needs resolved and any development would need to consider how it might increase the surface water to be managed to prevent it getting worse.
- 10. The LDP states a housing density of 10 houses/ha. 20Ha and 200 houses, yet the Call for sites proposed 22-25/ha which is more like 400-500 houses. This is a big variance and with a higher than average quantity of cars per household, this site would add a considerable number of cars/day travelling through town to access amenities which are biased to the west of the town centre. Related to this would equally be an additional load on the local High St air quality which is already at limits sufficient to initiate an air quality management action plan. While those at the western edge may choose to walk to the train station to commute, it's very likely that those in the east of the proposed site would drive and add further stress to the town's car-parking infrastructure.
- 11. Sewage and other services. Neither side of the canal in this site is served by services. Power is limited, sewage is non existent on also doesn't exist. These would all need to be extended to make the site viable.
- 12. A low level electrical feed to Wilcoxholm Farm runs along the ridge of Pilgrimshill and over the canal and this may need removed or buried to make the site safe and suitable for development.

13. The small field between housing blocks and opposite the turnoff to Porterside contains the network of field drains which all of the properties to the east of this field use as an outlet pathway for domestic septic tanks most of which are located to the rear of the properties and do not flow towards the street. No development should be considered in this vacinity without solving this matter first. Homeowners on (all of them) should not be charged or inconvenienced in any way by any future development.

LDP in General.

Overall, we find the LDP disappointing and not reflective of the pressures, opportunities and challenges that are unique to Linlithgow.

Alternative Sites for Housing Instead of prime agricultural land being destroyed:

* Land south of the canal opposite St. Magdalines, east of Clarendon and west of St. Michael's Hospital and Day Care Centre is steep sloped, north facing, much closer to town for encouraging active travel and has less agricultural benefit due to the limitation of light and farm vehicle operational tilt limits than H-LL 11. This site would also provided the much needed link road from to the top of Manse Road as a mini-bypass, thus reducing the traffic at skew bridge (railway bridge at High Port).



- * The ex-quary at Kettilstoun owned by CEMEX. This is reclaimed brownfield and CEMEX have already applied for planing permission to develop this site.
- * Stuart House could be converted from offices to flats.
- * Victoria Hall could be re-developed to be retail units and flats above.
- * Shops with empty flats above could be forced to make them suitable for housing.
- * Re-development of the Cross Car Park and Vennel Guyancourt could offer better underground multi-level [hidden] parking in the conservation zone and flats above.

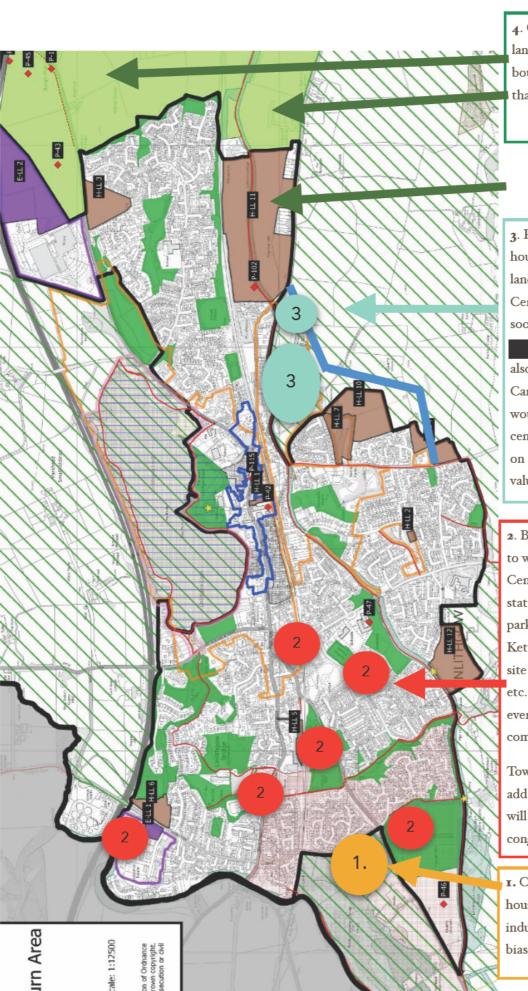
- * Bonded warehouse at Edinburgh Road could be re-located to Mill Road Ind Estate and freed up for flats similar to Dawson's Court.
- * Land behind St. Michael's RC Church could be used for loch-side apartments.
- * Doomsdale is contaminated land and could be cleared and made suitable for limited development, retaining some land as green-space.

In summary, we feel that the Council have not paid sufficient consideration to protecting prime agricultural soils, are choosing to increase housing to the east, when the majority of infrastructure is biased to the west thus increasing High St through traffic and associated congestion, pollution and degradation of the conservation zone, and finally there seems to be little detail in the LDP to encourage the re-use and repurposing of obsolete land and buildings which could easily be transformed to provide smaller affordable flats and starter homes which is what the town needs.

Sincerely yours,

Mr A & Mrs M Brown

Following Page: a sketch diagram to illustrate objection to housing and loss of prime agricultural land to the east of town (4) and two alternative housing development sites (1 and 3) both considerably closer to infrastructure which is biased to the west of town (2) and both lower grades of land more suitable for housing.



4. **Objection** to H-LL II and land east of existing development boundary for any purpose other than agricultural.

3. Preferred location of new housing on site of old poors-house land and adjacent to Day Care Centre which will be redundant soon. Access road from

to top of Manse Road would also reduce through traffic at Canal Basin Bridge. New housing would be much closer to town centre compared to H-LL 11 and, on land which has less agricultural value,

2. Bias of primary infrastructure to west of town. Academy, Leisure Centre, Supermarket, petrol station, retail park, industrial park, CRC, rugby club fields, Kettilstoun Dev Trust proposed site for cycle track, kayak centre, etc. Note Academy is also for evening use as a Theatre, community sports, etc.

Town is biased to WEST, so why add more housing to EAST, this will only worsen air pollution and congestion.

n. CEMEX ex-quary. ideal for housing. NON-agricultural, exindustrial, close to facilities all biased to the west of town.