

Livingston Village Community Council

Chair Brian D Johnstone

Planning Secretary Alan Nicholson

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West Lothian Council

Development Planning

Civic Centre

Howden South Road

Livingston

EH54 6FF

20<sup>th</sup> November 2015

For the Attention of Fiona McBrierty

**West Lothian Local Development Plan**

In response to your invitation letter dated 7<sup>th</sup> October 2015 to comment on The Proposed Plan for the above I now on behalf of Livingston Village Community Council lodge the following detailed representation regarding the plan.

We decide to make a number of statements by letter based on opinions and comments expressed to us rather than attempt the council website portal. A number of us attended the evening briefing sessions and found these interesting particularly sharing comments with other Community Councils. It was enlightening to see the same concerns arising from different areas.

We have selected the following 9 headings on which to make comment

- 1 The maps or plans as tabled at the evening sessions
- 2 Housing developments
- 3 Infrastructure concerns
- 4 Transport issues
- 5 Edge of centre retail provision
- 6 Allotment provision
- 7 Affordable housing percentage
- 8 Unconventional gas extraction
- 9 Planning Integration

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## **1. Maps or plans tabled at briefing sessions.**

We suggest some legibility improvements would aid study of these maps. The dominance of the dark green denoting “land safeguarded for open spaces” obliterates some map features such as paths and roads. At this scale the faintness of the background street maps can make navigation tricky. A similar obliteration is also present in the larger light green areas denoting “countryside belt”

The dark blue line meant to delineate the town centre area requires to be checked throughout its length. There is at least one error adjacent to area MU5 at Adambrae.

The land to the west of Alderston Road opposite the stadium is almost fully covered by green diamonds which we interpret as “local diversity”. The majority of this land has had council housing plus and an access road built here under planning reference 0778/FUL/10. So this area should be refreshed to include that element of the new street plan.

## **2. Housing Developments.**

The area of greatest potential growth throughout West Lothian is housing. The level of approximately 1100 per year up to 2024 is probably greater than for any other regional council. This is obviously heaviest in the named core areas such as Winchburgh but Livingston also has a lion’s share in the allocation of land for housing use.

The Scottish Government has set the housing figures and decreed what West Lothian Council is required to provide rather than WLC decide what it can contribute with comfort.

It is noted that the areas for housing has been reduced from that shown in the Main Issues Report which stemmed from the earlier land search exercise. In particular the areas to the south of Murieston have far less reserved for housing areas. Could this lead to some non compliant applications or indeed some appeals for planning approval already in the pipeline?

The main concern emanating from discussions on the provision of houses was not the houses per say but the supporting infrastructures. This is more of a concern in areas NOT defined as the core areas where new infrastructure seems to be reasonably well catered for

### **3. Infrastructure Concerns.**

Most will acknowledge that there is severe strain on existing infrastructure support within Livingston as a whole. The main items so afflicted are Education, Medical Treatment and Roads.

School capacities are close to being overstrained at present.

Medical practices all seem to be oversubscribed now.

Road congestion within the town gets worse.

Less at risk but still important are drainage systems and primary energy provision. Perhaps they are less at risk because they have different ownership!

On drainage it is noted within the plan that there are repeated mentions of limited capacity at both at East Calder and Newbridge waste water treatment plants. Pressure must therefore be applied to Scottish Water for funding to augment capacity for waste water treatment to fit into the housing growth plan.

The support infrastructure must be part of the composite planning and grown similarly and contemporaneously. Lack of funding seems to be the barrier to the early development of adequate infrastructure capacity. Its procurement always lags behind the need. It appears that West Lothian Council cannot support the development without external funding.

So if funding needs to be found then West Lothian Council – and probably other council - must stand up strong to seek and obtain additional Scottish Government funding for fast infrastructure growth. After all Scottish Government imposed the housing numbers

It is intolerable to saddle all the private developers with monstrous infrastructure developer contributions all the time. Agreed yes they shall make contributions but reasonableness has to prevail. Hence other fund sources are also needed if the infrastructure growth stands a chance of keeping pace with 1100 plus houses per year.

### **4. Transport Issues.**

North South routing within Livingston is primarily served by the dual carriage way to the east – which seems to cope – and Alderston Road to the west – which does not cope at present at peak times, never mind imposing further traffic onto it.

We could not ascertain if any improvements to Alderston Road were included in the Proposed Plan. If none are noted then this is remiss and further proposals to alleviate overloading Alderston Road must be added to the plan.

Outside of Livingston which is home to a large number of commuters who work away from Livingston some longer term upgrading of the A71 becomes more essential. This because if there are more houses there will be more commuters heading to work outside the town.

Some improvements are seen in the plan but are they enough just to alleviate today's load rather than the increased load in 2014?

Looking northward toward Falkirk the A801 corridor improvements need to be brought forward. In particular the cross border Avon Gorge scheme should be implemented forthwith. It has been approved for some time now and need to get to the stage of publishing start of construction dates. It was rumoured that the savings intimated earlier for the Queensferry Crossing would be reallocated to Avon Gorge. Is it known if such savings are still a probability?

#### **5. Edge of Centre Retail Provision**

As housing sites sprawl further and further outward toward the Livingston town boundaries there should be some provision for the smaller retail zones.

#### **6. Allotment Provision**

Following the resounding success of the Killandean Allotment site this sort of development should find space in the forward plan. This is a growing interest activity in West Lothian and should be encouraged either as Killandean a private enterprise leasing council land or by West Lothian Council running similar sites

#### **7. Affordable Housing percentage.**

The affordable housing allocation from new market housing development is shown as increasing from the current 15% to 25% as seen on page 28 of the plan document. This surely creates a risk that some developers could stand back from a site build because the site sales economics could no longer stand up

#### **8. Unconventional Gas Extraction (fracking)**

Policy MRW5 makes reference to this. A moratorium is in place over this at present but no doubt Ineos and possible others will pressurize for this to be lifted and off we go drilling all over the area. We at LVCC attend Chris Norman's trainings sessions on Planning we thus suggest the planning process for fracking appears on one of his programmes. "Mr Ineos" is running exhibitions all over the areas to the west of us but no doubt encroachments will eventually spring into West Lothian. Our concern is that the drilling process is visible above ground but the horizontal drilling and extraction radiates outward from the well deep underground. How does a planning authority define AND POLICE a boundary for this radiated extraction to prevent

unforeseen problems of contamination – or other issues- spreading in the substrata and affecting ground below properties.

## **9. Planning Integration**

We have linked these two words together to try to describe an urgent need to introduce some mechanisms into development planning whereby early co-ordination from the developers embryo and first alert of housing proposals appearing on the horizon is conveyed to the various infrastructure providers at the earliest possible opportunity.

This can also be defined as pro-active planning rather than re-active reaction and should be an integral part of the planning process. Again as stated in our Infrastructure Concerns of part 3 the main areas that often lag too far behind housing building are Education and Medical Treatment

Now triggers may exist to alert the relevant authority or department. However we question if these triggers are early enough, powerful enough to get reaction, or if they really exist at all. So we repeat a linking proactive mechanism is needed for each and every housing development to each and every service provider.

Lack of funding will be raised as the reason why infrastructure tends to be reactive. Thus we suggest a financial element be introduced by loans or whatever to load the front end capital of developments so that delays are minimized for the integrated planned proposal.

## **CONCLUDING SUMMARY**

We have considered only 9 topics from the Proposed Plan and made comments that were frequently voiced rather than one off statements. We feel sure similar points will be raised by other Community Councils. We trust you do consider our points in the run up to finalising the plan

Yours Faithfully

*Signed - Brian D Johnstone*

Brian D Johnstone

Chair

Livingston Village Community Council