

The following grounds of objection primarily relate to the area of the land at Wilcoxholm Farm/Pilgrims Hill ("WFPH"), Reference H-LL 11, which it is proposed be designated as suitable for housing.

The inclusion of the site at WFPH on the local development plan runs contrary to policy and fails to take into account the material considerations identified in this objection.

Taking each ground of objection in turn:

1. Landscape

"POLICY ENV 1 Landscape character and special landscape areas" states:

"Development will not be permitted where it may significantly and adversely affect local landscape character. ..."

A development on the scale as proposed at WFPH would significantly alter the character of the landscape in this part of the town. The open farmland which currently exists on the approach to Linlithgow from the east provides a gentle introduction to the historic town of Linlithgow.

In addition the proposed development does not represent a 'rounding off' of developments within Linlithgow. The development at Springfield is separated from the site at WFPH by the canal. Therefore the extent of the current developments to the east of Linlithgow have reached their natural boundary.

Further such a development would materially alter and adversely affect the proposed Special Landscape Area to the south. I am of the opinion that the appropriate course would be to designate WFPH as Special Landscape Areas, or alternatively Greenfield land.

2. The Union Canal

"POLICY ENV 12 The Union Canal" states:

"Conservation, recreational and economic proposals associated with the Union Canal will be supported, especially at Linlithgow, Broxburn and Winchburgh, provided they:

- a. sustain and enhance the natural and built heritage of the canal in its setting;*
- b. allow opportunities for access and biodiversity promotion and improvement along the canal and the emerging CSGN green network as a whole; ..."*

The development of WFPH would be contrary to Policy ENV 12 for the following reasons:

- The canal runs through the middle of the proposed development. The WFPH development would impact upon the natural landscape of the canal, wildlife and flora present.
- It is inevitable that substantial infrastructure works will be required to the existing aqueduct over Edinburgh Road if development proceeds. The historic bridge will in all likelihood be destroyed and the character of that area materially altered.
- In addition, the bridge at Wilcoxholm is unsuitable for the volume of traffic that a development on this site would bring. That suggests it will either be destroyed, or overshadowed by a replacement bridge.

3. Drainage

The draft plan, states that: *"There is also a potential risk of flooding to properties in the town bay due to the balancing function performed by the loch through a complex series of level controls."*

The drainage in the Maidlands area is currently insufficient. During periods of rain the drainage blocks and causes flooding on Edinburgh Road. In addition the burn running to the south of Edinburgh road, into which the run off from the septic tanks on Edinburgh Road currently drains, results in a strong smell of sewage in the area close to St Michael's hospital. Any future development in the Edinburgh Road area will only cause these issues to worsen. Before designation for housing is

considered, the authority should conduct an impact assessment of a developed area being imposed on the existing drainage infrastructure.

4. Traffic

The draft plan recognises the difficulty with traffic as it provides that: "*Junction Improvements required...Impact on road capacity needs detail (sic) consideration.*"

The proposal however fails to take into account the significant issues that already exist with traffic in the vicinity of the WFPH development.

In my opinion little can be done to improve the constraint that the high street places on traffic flow. The High Street cannot currently cope with the volume of traffic which passes through at peak times. The topography of Linlithgow does not lend itself to a ring road being constructed.

The railway bridge to the east of the station restricts traffic flow as it only allows for single lane traffic. The same issue exists with the aqueduct to the east of St Magdalenes. It is difficult to see how these issues could be overcome.

In addition the access to the northern part of the WFPH development is proposed through the Maidlands development. This access is single lane and not suitable for a development of this scale.

In my opinion, prior to such a large area of land being designated for housing the authority should consider and address the constraints identified above and the measures that would be required to address these.

5. Short distance car use

Problems of traffic congestion and parking in and around the High Street and station area are particularly acute and of concern to the community.

Whilst policy TRAN 3 calls for Core Paths and Active Travel, the development at WFPH will simply add to the existing issues of congestion. As a commuter to Edinburgh on the train, and a resident on Edinburgh Road, my experience is that during times of bad weather short distance car use to travel to and from the station increases. In addition car use increases during periods of bad weather for those who drop off/pick up children from school/nursery within Linlithgow.

The existing local plan states: "*6.30 The adopted Linlithgow Area Local Plan (1994) established the principle that Linlithgow had reached its environmental capacity.*"

The issues identified in the 1994 Plan have not disappeared, they have worsened. In the circumstances to allocate land for some 200 houses would be irrational in the absence of a clear understanding of how the issue of environmental capacity will be addressed.

6. Parking

In addition to the issue of short distance car use, the issue of parking has not been addressed. Adding a development with a capacity of 200 units will simply add to the parking issues that currently exist.

7. Air quality

The addition of 200 units will generate significant levels of pollution through short distance traffic and commuter traffic. This is recognised in the draft plan:

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.

"POLICY EMG 4 Air Quality" states: "...Development will not be supported where it is not possible to mitigate the adverse effects of that development on air quality effectively or where development proposals cause unacceptable air quality or dust impacts, or would result in sensitive uses, which give rise to air pollution concerns, being located within or close to uses with potential to generate such pollution."

The scale of the development proposed at WFPH, and associated short distance car use that this will bring, would be contrary to policy given that the issue of air quality is already a "cause for concern".

8. Education infrastructure

Linlithgow Academy and Lowport primary schools (which are the current catchment for Edinburgh Road) are at capacity. It is not clear how the education needs of children from this area would be catered for. The existing limit for "walking distance" to the Academy is the aqueduct bridge on Edinburgh Road. The proposal at WFPH is further away than that, and so runs contrary to the Council's own guidance.

9. Understatement of impact

The proposal suggests that the site would have a capacity of 200 units. However the land owner's Expression of Interest indicates that the land would support 22-25 units to the hectare. With 20 hectares, that is 440 to 500 units. The plan therefore proceeds on an error of fact.

10. Marketability or effective housing land

The draft plan provides that:

"5.50 In preparing the housing sections of the LDP, the council is required to have regard to national planning policy as set out in SPP2014 and Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits. Amongst other things, these documents require local authorities to provide a generous housing land supply to meet housing need across all tenures and to maintain at all times a five year effective supply of housing land.

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."

These comments inform Policy HOU 2 "Maintaining an Effective Housing Land Supply".

The issues identified in these objections are not addressed in any way which could give the authority the ability to say that the site at WFPH is free, or expected to be free, of development constraints in the period under consideration, and will therefore be available for the construction of housing. In the absence of appropriate data to inform the scale of the problems for this site and the scale of the remediation required, development at WFPH would be contrary to policy, contrary to PAN 2/2010 and

indeed irrational. It would be unreasonable and irrational to proceed without data to illustrate how those constraints would be addressed.