



West Lothian Council

THE WEST LOTHIAN LOCAL DEVELOPMENT PLAN (LDP)

CONSULTATION RESPONSE PORTAL

Have Your Say on the Proposed Plan

Introduction

West Lothian Council has published its Proposed Plan together with supporting documents including an Environmental Report (SEA), Habitats Regulation Appraisal, Strategic Flood Risk Assessment and Equalities & Human Rights Impact Assessment. These can be viewed on the West Lothian Council website at www.westlothian.gov.uk/proposedplan.

If you wish to make representations on the Proposed Plan or associated documents you are encouraged to use this online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

You do not need to complete this questionnaire in a single visit. Just simply put your Survey Reference Number (CODE) in the top right corner of the screen to allow you to continue with your submission at a later date.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the Local Development Plan and ask for it to be logged and directed to the Development Plan and Environment Team. Someone will contact you. Alternatively you can email us at wlldp@westlothian.gov.uk We will endeavour to respond as quickly as possible but in any event within 3 working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

Data Protection Statement

Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).

We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination in Public of the Proposed Plan to discuss your representation.

Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.

1. GENERAL INFORMATION

Your Details

Please indicate in what capacity you are making this submission: *

Please note that this is a mandatory field

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information: *

Please note that this is a mandatory field

Title

First Name

Surname

Email Address

Telephone

Postal Address

Organization Name

Client's Name

Is this the first time you have made a written representation on the Proposed Plan? *

Please note that this is a mandatory field

- yes
- no

If you have previously submitted a site to be considered for development when the Council was initially seeking Expressions of Interest (EOI), or commented on the Local Development Plan at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you

Enter EOI (Expression of Interest) reference here

Enter MIRQ (Main Issues Report) reference here

Please enter your survey reference number in the text box below. *

Survey Reference Number (CODE) can be found in the top right corner of this screen
Survey Reference Number (CODE) will allow you to save your responses and return to finish the survey later

Please keep a note of your Survey Reference Number (CODE) for future reference

Please note that this is a mandatory field

2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

3. BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

4. CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

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5. ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the Council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning Act (Scotland) 2006 and what documents will accompany the plan i.e. the Action Programme etc.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

6. VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant sub-section(s) of Vision Statement and Aims from the list below.

- Economic Development and Growth (page 8)
- Community Regeneration (page 8)
- Sustainable Housing Locations (page 9)
- Infrastructure Requirements and Delivery (page 9)
- Town Centres and Retailing (page 9)
- The Natural and Historic Environment (page 9)
- Climate Change and Renewable Energy (page 9)
- Waste and Minerals (page 9)

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Economic Development and Growth (page 8)	<input type="checkbox"/>
Community Regeneration (page 8)	<input type="checkbox"/>
Sustainable Housing Locations (page 9)	<input type="checkbox"/>
Infrastructure Requirements and Delivery (page 9)	<input type="checkbox"/>
Town Centres and Retailing (page 9)	<input type="checkbox"/>
The Natural and Historic Environment (page 9)	<input type="checkbox"/>
Climate Change and Renewable Energy (page 9)	<input type="checkbox"/>
Waste and Minerals (page 9)	<input type="checkbox"/>

7. THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant sub-section(s) of the Spatial Strategy from the list below.

- Economic Development and Growth (page 12, paragraphs 5.11-5.22)
- Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)
- Enterprise Areas (page 17, paragraphs 5.24-5.25)
- Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)
- Tourism (page 17, paragraphs 5.27-5.28)
- Promoting community regeneration (page 19, paragraphs 5.29-5.35)
- Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)
- New Housing Sites and Design (page 24, paragraphs 5.4-5.56)
- Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)
- Whitburn/Charette (page 26, paragraph 5.62)
- Linlithgow and Linlithgow Bridge (page 26-27)
- Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)
- Affordable Housing (page 27, paragraphs 5.69-5.74)
- Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)
- Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)
- Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)
- Providing for Community Needs (page 32, paragraphs 5.85-5.88)
- Education (page 32, paragraphs 5.89-5.92)
- Healthcare Provision (page 33, paragraphs 5.93-5.96)
- Sports Facilities (page 33, paragraphs 5.97-5.101)
- Green Infrastructure and Green Networks (page 34, paragraphs 5.102-5.105)
- Water and Drainage (page 34, paragraphs 5.106-5.107)
- Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)
- Roads (page 35, paragraph 5.113)
- A71 Corridor (page 35, paragraphs 5.114-5.115)
- A801 Corridor (page 35, paragraphs 5.116-5.117)
- A89/A8 (page 35, paragraphs 5.118-5.126)
- Rail (page 37, paragraphs 5.127-5.130)
- Walking and Cycling (page 37, paragraphs 5.131-5.132)
- Town Centres and Retailing (page 39, paragraphs 5.133-5.138)
- Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)
- Countryside Belts (page 42, paragraph 5.144)
- Development in the Countryside (page 42, paragraphs 5.145-5.147)
- Lowland Crofting (page 44, paragraphs 5.148-5.152)
- Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)
- Forestry (page 46, paragraphs 5.156-5.163)
- Union Canal (p.49 paragraphs 5.164-5.165)
- Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)
- Country Parks (page 50, paragraph 5.169)
- Allotments/Community Growing (page 51, paragraphs 5.170-5.171)
- Temporary/Advance Greening (page 51, paragraphs 5.172-5.174)
- Biodiversity (page 52, paragraphs 5.175-5.180)
- Geodiversity (page 53, paragraph 5.181)
- West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)
- Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)
- Conservation Areas (page 55, paragraphs 5.185-5.188)

- Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)
- Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)
- Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)
- Listed Buildings (page 58, paragraphs 5.185-5.187)
- Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201)
- Historic Battlefields (page 60, paragraph 5.202)
- Archaeology (page 60, paragraph 5.203)
- Scheduled Monuments (page 60, paragraphs 5.204-5.206)
- Public Art (page 61, paragraphs 5.207-5.208)
- Climate Change Measures (page 62, paragraphs 5.209-5.214)
- Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)
- Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)
- Energy and Heat Networks (page 66, paragraphs 5.226-5.229)
- Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)
- The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)
- Air Quality and Noise (page 70, paragraphs 5.240-5.242)
- Edinburgh Airport (page 71, paragraph 5.243)
- Noise (page 71, paragraph 5.244)
- Contaminated Land (page 71, paragraphs 5.245-5.246)
- Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)
- Minerals and Waste (page 73, paragraphs 5.251-5.256)
- Site Restoration (page 75, paragraphs 5.257-5.238)
- Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)
- Waste (page 76, paragraph 5.260)

Please use the text box below for your comments.

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Linlithgow and Linlithgow Bridge (page 26-27)

This text box is too small so I have put my comments in the additional comments box

Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)

The draft LDP simply does not offer a solution to the infrastructure issues within Linlithgow. These will only be exacerbated by additional development. The main problem is, of course, transport, which has a knock on effect on air quality. Even if the promised two new motorway slip roads are actually built, this will not reduce the number of local journeys that have to go via the High Street. Some sort of by-pass is required before the traffic and air-quality problems can be resolved. This is not addressed in the draft LDP. Nor are the question of adequate parking facilities, particularly near the train station, or the flooding and drainage issues that affect the town - especially in relation to run-off water draining into the Loch. The proposed LDP says that "where infrastructure constraints, identified by the council in conjunction with relevant authorities, cannot be overcome, there will be a presumption against development." Including large sites such as H-LL 11 within the LDP is therefore irrational, as the recognised infrastructure constraints within the town must make them unlikely to be approved for development.

Rail (page 37, paragraphs 5.127-5.130)

The EGIP will undoubtedly improve the transport links from Linlithgow - but the plan does not seem to make any provision for additional parking within the town. More commuters can only make the parking situation worse, and it is bad enough at the moment.

Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)

H-LL 11 is an important area in the context of the local landscape, particularly for those entering the town from the east. The Linlithgow Civic Trust, in its 'A VISION FOR LINLITHGOW 2005 - 2015,' identified the site as an area that should be kept free of urban development, in order to preserve and protect the character of the landscape around the town. To allow development here would run contrary to Plan's 'Policy E1V 1 Landscape character and special landscape areas', which says 'Development will not be permitted where it may significantly and adversely affect local landscape character'.

Union Canal (p.49 paragraphs 5.164-5.165)

The development of H-LL 11 may well be contrary to Policy E1V 12 because the proposed development will straddle the Union Canal. At present that stretch of the canal is relatively quiet and hosts a multitude of diverse flora and fauna. The development would inevitably damage this environment and constrain biodiversity, contrary to policy. The authority should commission a full comparative study of biodiversity within the existing town boundaries and outside the town before taking a decision on this allocation. The canal itself is a Scheduled Ancient Monument and will inevitably be impacted by developing the site at H-LL 11, possibly in breach of LDP POLICY E1V 33. In view of this, has the authority carried out a risk assessment of the impact of building to either side of the canal, particularly in view of the topography of the fields involved?

Biodiversity (page 52, paragraphs 5.175-5.180)

See comments on Union Canal

Scheduled Monuments (page 60, paragraphs 5.204-5.206)

See comments on Union Canal

The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)

Policy EMG 2 Flooding states that "Development will specifically not be supported in: a. locations identified as being at medium to high flood risk, unless it accords with the flood risk framework set out in SPP2014; or b. where it would lead to an increase in the probability of flooding elsewhere." The development of H-LL 11 contains land identified in SEPA's flood management risk maps as being at high risk of surface water flooding. At the moment this land is an arable field, and capable of absorbing a large amount of surface water. If the area is developed, this absorption capacity will be drastically reduced, resulting in even more surface water, and therefore a greater risk of flooding. The proposal also seems to fly in the face of the likely results of climate change - more extreme weather, including heavy rain and flash floods. In addition, most of the run off drains off through the existing drainage system in neighbouring [redacted] ending up in Linlithgow Loch. While remediation works have taken place on the drainage system, so that it copes with the current situation, if the site is developed and the run off increases, this will have implications for neighbouring properties and those situated near the drainage system as it works its way down to the Loch. In my view, zoning H-LL 11 for development would therefore seem contrary to Policy EMG 2.

Air Quality and Noise (page 70, paragraphs 5.240-5.242)

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." Linlithgow High Street is already recognised as having problems with air pollution. While smaller incremental development could perhaps be presented for approval and not have a material impact on air quality, to propose such a large area for development as H-LL 11 in the face of what the draft LDP already calls "a significant source of concern" bears to be contrary to policy and indeed irrational. This is particularly so when there are obvious alternative areas for development in other areas.

8. DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Settlement(s) from the list below.

- Addiewell & Loganlea (page 79)
- Armadale (page 80)
- Bathgate (page 81)
- Blackburn (page 82)
- Blackridge (page 83)
- Breich (page 83)
- Bridgehouse & Bridgecastle (page 83)
- Bridgend (page 83)
- Broxburn (page 84)
- Burnside (page 84)
- Dechmont & Bangour (page 85)
- East Calder (page 85)
- East Whitburn (page 86)
- Ecclesmachan (page 86)
- Fauldhouse (page 86)
- Greenrigg (page 86)
- Kirknewton (page 87)
- Landward area (page 87)
- Linlithgow & Linlithgow Bridge (page 89)
- Livingston (page 90)
- Longridge (page 93)
- Mid Calder (page 93)
- Hewton and Woodend (page 93)
- Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)
- Polbeth (page 93)
- Pumpherston (page 93)
- Seafield (page 93)
- Stoneyburn/Bents (page 94)
- Threemiletown (page 94)
- Torphichen (page 94)
- Uphall (page 94)
- Uphall Station (page 94)
- West Calder & Harburn (page 95)
- Westfield (page 95)
- Whitburn (page 96)
- Wilkieston (page 97)
- Winchburgh (page 97)

Please enter site reference(s)/proposals reference (as appropriate) and location/site address below.

Site Reference/ Location / Site Address can be found in the relevant Settlement Statement

	site reference	location/ site address
Linlithgow & Linlithgow Bridge (page 89)	H-LL 11	Wilcoxholm Farm/Pilgrims Hill

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Comment

Linlithgow & Linlithgow Bridge (page 89)

This comment box is too small so I have used the additional comments box instead

9. APPENDICES (page 99)

A number of appendices are included at the end of the LDP which provides additional detail on specific elements of the Proposed Plan.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Appendix(es) of the Proposed Plan from the list below.

- Appendix 1 - Employment Land Allocations (page 99)
- Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)
- Appendix 3 - Schedule of Land Ownership (page 259)
- Appendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)
- Appendix 5 - List of Policies (page 273)
- Appendix 6 - List of Proposals (page 275)

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Appendix 1 - Employment Land Allocations (page 99)	<input type="text"/>
Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)	<input type="text"/>
Appendix 3 - Schedule of Land Ownership (page 259)	<input type="text"/>
Appendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)	<input type="text"/>
Appendix 5 - List of Policies (page 273)	<input type="text"/>
Appendix 6 - List of Proposals (page 275)	<input type="text"/>

10. GLOSSARY (page 280)

An explanation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

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11. PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Proposals Maps from the list below.

- Proposals Map 1 - West Lothian
- Proposals Map 2 - Linlithgow & Broxburn Area
- Proposals Map 3 - Livingston Area
- Proposals Map 4 - Bathgate Area
- Proposals Map 5 - Villages

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Proposals Map 1 - West Lothian	<input type="text"/>
Proposals Map 2 - Linlithgow & Broxburn Area	<input type="text"/>
Proposals Map 3 - Livingston Area	<input type="text"/>
Proposals Map 4 - Bathgate Area	<input type="text"/>
Proposals Map 5 - Villages	<input type="text"/>

12. ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant Accompanying Documents from the list below.

- Strategic Environmental Assessment (SEA) Environmental Report.
- Equalities & Human Rights Impact Assessment (EQHRIA).
- Strategic Flood Risk Assessment (SFRA).
- Habitats Regulations Appraisal.
- Transport Appraisal (TA).
- Action Programme.

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Strategic Environmental Assessment (SEA) Environmental Report.	<input type="text"/>
Equalities & Human Rights Impact Assessment (EQHRIA).	<input type="text"/>
Strategic Flood Risk Assessment (SFRA).	<input type="text"/>
Habitats Regulations Appraisal.	<input type="text"/>
Transport Appraisal (TA).	<input type="text"/>
Action Programme.	<input type="text"/>

13. ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

- yes
- no

Please use the text box below for your additional comments on the LDP.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Linlithgow and Linlithgow Bridge

I do think that Linlithgow and Linlithgow Bridge need investment and development, but I question whether the draft LDP currently fulfils the broad policy requirements of its own spatial strategy: "the allocation of land in the right locations to accommodate development needs and the phasing of development to secure the provision and delivery of infrastructure to accommodate development."

The plan as it stands calls for development before infrastructure. It simply does not resolve the major infrastructure problems that currently affect the town and which will only be exacerbated by additional development. The main one is, of course, transport. Even if the much-talked about two new motorway slip roads are actually built, people will still have to travel locally - most often along the High Street. The addition of a large number of new properties in Linlithgow will add to this congestion and, inevitably, to the air pollution that is a recognised issue on the High Street.

A by-pass of some sort must be the answer. Tinkering round the edges with traffic light timings or traffic wardens is not a long-term solution, and is it realistic to expect developers to pick up the cost of building a by-pass as part of their planning conditions? I suspect not. So who will build it? Or fund it? I know these are difficult questions but I do not see how major developments can be justified in Linlithgow without first finding the answers.

While I appreciate that one education constraint (capacity at Linlithgow Academy) is likely to be resolved when the proposed Winchburgh secondary school is built, this does not resolve the issues with the primary schools. Lowport Primary, for example, is the catchment school for H-LL 11, but is at capacity too. This issue will not be resolved by building new schools in Winchburgh.

Other infrastructure issues that remain unanswered include parking, flooding and drainage. It would seem strange to approve the plan without data to show the scale of these problems and the likely cost of the remediation involved - throughout the town as a whole. Has this been done, and are the results such that the problems can realistically be resolved as part of any future planning conditions? If they are not, then it would seem irrational to zone large sites for development within Linlithgow at this time.

As the draft LDP says "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." In my view, the current proposals for Linlithgow do not appear to meet this fundamental requirement.

H-LL 11

In my opinion, including the land at H-LL 11 (Wilcoxholm Farm/Pilgrims Hill) within the plan runs counter to the draft LDP's POLICY HOU4 on Windfall Housing Development in Linlithgow and Linlithgow Bridge. This is because of the impact a development on that site is likely to have on its landscape setting, the Union Canal, traffic congestion, air quality and drainage within the town and the availability of education capacity.

The local catchment primary school (Lowport) is at capacity, meaning that pupils would have to travel further afield, possibly outwith walking distance. On top of this, while Academy pupils in [REDACTED], which borders a portion of the site on the west, are currently required to walk to school, those residing on the other side of the aqueduct (50 metres away) are eligible for a school bus. The bulk of H-LL 11 would therefore be outwith walking distance. This would inevitably have an impact on congestion within the town.

Congestion is already an issue in Linlithgow, and H-LL 11, with its proposed 200 houses, would not only add to the number of cars overall, but any journeys within the town from the site would have to go through a number of bottlenecks: at the aqueduct on Edinburgh Road or the narrow exit from [REDACTED] onto Edinburgh Road; the railway bridge on Edinburgh Road and of course, the High Street.

Furthermore, H-LL 11 straddles the Union Canal, a Scheduled Ancient Monument, and as the site is mostly on a slope, major strengthening works will undoubtedly be required to make sure the Canal is neither affected by any development, nor a risk to public safety.

In addition, areas of the proposed site are already at high risk of surface water flooding (see SEPA's flood risk management plan). This run off drains away through the existing drainage system in neighbouring [REDACTED]s, ending up in Linlithgow Loch. While remediation works have taken place on the drainage system, so that it copes with the current situation, if the site is developed, reducing the ground available to soak up the rain, then the run off will increase dramatically and put the system under strain.

The site is also important in the context of the local landscape, particularly for those entering the town from the east. The Linlithgow Civic Trust, in its 'A VISION FOR LINLITHGOW 2005 - 2015,' identified the site as an area that should be kept free of urban development, in order to preserve and protect the character of the landscape around the town. To allow development here would run contrary to Plan's 'Policy EHV 1 Landscape character and special landscape areas', which says 'Development will not be permitted where it may significantly and adversely affect local landscape character'.

Additional comments

I believe that the draft LDP should be amended to include:

- Plans to reduce congestion in the High Street
- Plans for a High Street relief road/by pass north of the loch between Bonnytoun and St Ninians Road (A706)
- Plans for a reduction of pollution in the High St
- A new road between M9 and Edinburgh Road
- A new road from Edinburgh Road to Manse Road South to relieve Manse Road bridge
- Considerably more town centre parking
- Keeping the health centre in the centre of the town
- Planning for combined health and care services
- Upgrading the road from Manse Road South to Dechmont to a B class road
- A cross town cycle path
- A coach/car park to encourage tourism

Until infrastructure changes like these are implemented, particularly in relation to congestion, parking and air pollution, the LDP should not include large scale developments such as H-LL 11.

Before pressing the submit button please review your submission and make any changes. Once you have pressed SUBMIT you will be unable to go back to the survey.

Once we have received your submission we will send you a copy for your records. This could take up to 5 working days. If you do not receive a copy in that time please contact the Customer Service Centre.

CONFIRMATION OF YOUR PARTICIPATION

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