



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.

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.

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)

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.

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.

Tourism (page 17, paragraphs 5.27-5.28)

Objection: The developments H-LL 4, H-LL 7 and H-LL 10 will have a significant adverse impact on the Canal Bridge (Manse Road Bridge) at the Linlithgow Canal Visitor centre. Combined, these developments will add an additional 183 households that will use this single lane bridge. Expansion and potential improvements at the Canal Centre that would/could support developing the visitor potential of the Union Canal at this location will be lost.

Linlithgow and Linlithgow Bridge (page 26-27)

Objection: The "area of restraint" should be maintained until a proper and workable solution to the High Street congestion issues is found. The Systra report based on computer modelling suggests that the current road network could support the proposed developments but clearly states that the residual traffic problem would remain. It also states "The mitigation measures are affected by the physical conditions" in short the railway bridges and canal bridge severely constraint the town. High Street congestion, which was one of the reasons for the "area of restraint", is being ignored. There are no real mitigation measures being considered or communicated to help with the town's current traffic problems. The only mitigation measure mentioned is to alter the traffic light sequencing; this is based on computer modelling, which is totally different from actual facts. Furthermore the proposed changes to the traffic light sequence has a significant detrimental affect at the High Port railway bridge, the majority of the developments proposed would be using this part of the road network. Prior to the lifting of the "area of restraint" based on computer modelling actual results could be gathered by implementing the changes to traffic sequencing now, at very little cost. In fact if as suggested this would improve the air quality on the High Street then it should be implemented now, without delay. In simple terms adding traffic to a congested network must be considered as negligent and irresponsible. WLC's transport department has failed to include the Canal Bridge (Manse Road Bridge) in their transport assessment. They have not considered the impact on the traffic on this bridge, which will be negatively impacted by changes in traffic sequences as it feeds directly to/from the High Port railway bridge. No consideration has been given to pedestrian safety on this single-track bridge. When considering suitable sites and giving preference to those nearest the railway station and town centre the actual physical conditions (constraints) were not taken into account. In particular this single-track bridge (Manse Road Bridge) could have up to 183 homes adding significant vehicle and pedestrian traffic to an existing problem area. The safety aspect of this bridge has been completely ignored and must now be addressed. For example development H-LL 10 (120 homes) should only have access via the Edinburgh Road.

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

Objection: Landscape Character and Local Landscape Designations - page 41 In regards to HH-L10, this development would encroach on the surrounding Special Landscape Area, access roads would need to be constructed across the SLA. Site HH-L10 should be included in the SLA.

Climate Change Measures (page 62, paragraphs 5.209-5.214)

Objection: WLC has an opportunity to show its commitment to Policy NRG1 in regards to development HH-L10 by allowing road access only from the Edinburgh Road and pedestrian only access via Clarendon Road or the farm track. This would encourage residents of this development to "walk" rather than take the car to the Railway Station or the High Street. Road access via the Edinburgh Road along with a bus service into the development would also provide a service to existing nearby residents that would reduce car journeys. There is no nearby bus service in the part of the town.

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

Objection: Air quality in central Linlithgow is a major problem, which supports the need to maintain the "area of restraint". WLC has a duty of care for the health of its residents. Any development in Linlithgow will have an adverse impact on air quality and therefore the health of the residents and visitors. The proposed sites will have a significant impact on air quality particularly the larger sites, H-LL 10 and H-LL 11. It should be noted that every day school children are subjected to the high levels of contamination being recorded as their crossing is just at the monitoring station. Once again if as suggested traffic sequencing could improve air quality then it should be done now.

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 10	Clarendon Farm

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)

Objection: This site should be removed. Partly lies within a Conservation Area, an access road to the site via Clarendon Road would impact this conservation area and would encroach on the surrounding Special Landscape Area. Over 283 local residents objected to the recently refused planning application for this site. Page 198 should state, "No road access via Clarendon Road will be considered due to safety concerns". Road safety: The single-track bridge (Canal Bridge) is a major road safety concern for the residents in this area. There have been numerous accidents on this bridge, most do not get reported to the police and therefore WLC's transport department do not consider it unsafe. A full comprehensive study of this bridge, if undertaken by WLC would show there are indeed issues with the bridge. This study should look at pedestrian use as well as vehicle use, for example when there are a few pedestrians on the bridge it is extremely dangerous as cars turn onto the bridge via a sharp, blind, left hand turn. The whole walking route to the Low Port School needs to be examined and made "SAFE". Additional traffic from this development will put schoolchildren in greater danger. WLC recognises that Clarendon Road Access is NOT SAFE; during the recently refused planning application WLC stated, "the council would, ideally seek an alternative route which is safer". WLC should note that a wrong decision now could result in a very expensive solution to "make this bridge safe". Please refer to the recent planning application and the documents submitted by the residents, in particular "Residents of Clarendon and Oatlands response to the council's and appellants' responses to the procedure notice issued on 12 January 2015" submitted 7/2/15.

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 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)

Objection: H-LL 7 - Page 197. Correct education tab, should be Low Port Primary and not Linlithgow Bridge Primary. H-LL 10 - Page 198. Remove completely; Linlithgow will never be able to support this size of development to the south of the railway line mainly due the constraints on the road infrastructure where multiple single lane roads exist because of the railway and canal bridges. Add no access via Clarendon Road will be considered due to safety concerns. Correct education tab, should be Low Port Primary and not Linlithgow Bridge Primary. H-LL 11 - Page 199. Remove completely; Linlithgow will never be able to support this size of development to the south of the railway line mainly due the constraints on the road infrastructure where multiple single lane roads exist because of the railway and canal bridges. Correct education tab, should be Low Port Primary and not Linlithgow Bridge Primary. H-LL 10 and H-LL 11 have been badly chosen due to their proximity to the railway station. No consideration has been given to the actual roads, multiple single-lane roads that serve these sites. In regards to H-LL 10 no consideration has been given to the actual topology of the landscape, the steep hill to get to this site will encourage more road use. Note that all three sites will put pressure on the Low Port Primary.

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.

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.

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.

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

We will send you an email notification as soon as your survey is submitted.

Please enter your email address below.

Anthony Daly Objection to the LDP. 20/11/2015.

The “area of restraint” is being lifted prematurely.

As stated secondary educational constraints are likely to exist till 2019, but it is possible that circumstances could impact and extend this date. The capacity issues at Low Port Primary remain and given the current forecast it is impossible for this school to accommodate the level of proposed development. WLC’s response to Low Ports capacity issue was *“The school roll may well fall in future years allowing development to take place.”* It would have to fall dramatically to accommodate the level of the proposed developments.

High Street congestion is an existing problem; the mitigation measures proposed are inadequate and unlikely to be effective. At best the mitigation measures may accommodate the level of the proposed developments but the High Street congestions problem will remain.

Air Quality has now reached the AQS objective, it is every easy to assume that additional traffic will cause the AQS objective to be exceeded. Further detailed assessment is current being done. WLC have a duty of care for its residents and as such should not allow their health to be put at risk due to these proposed developments.

Developments that add traffic to the Canal Bridge (Manse Road) should be removed; this is a serious matter of safety. Concerns have been raised numerous times with WLC and they are very limited on what they can do with the bridge. They are aware of the safety aspect of the bridge but have decided to ignore this when selecting sites for the LDP.

Given the aggressive nature of developers (particularly Gladmans) it is important to remove sites in the LDP until the above constraints have been addressed. Or at least clearly state that no development will be considered until the above constraints have been addressed. It can be seen from the recent public consultation by Gladman that they are ignoring the recent Scottish Ministers Appeal Decision and using the LDP as a reason. And then ignoring the LDP in regard to main access to be via St. Michael’s.

Schools:

Secondary Educational Constraints are likely to exist till 2019 and potentially beyond 2019.

*“Although there is not yet a firm commitment to the development of the new school at Winchburgh, the council is hopeful that this will be provided by 2019. However, I am also mindful of **the inherent uncertainties in the forecasting.**” (Report by [REDACTED], a Reporter appointed by the Scottish Ministers 27 May 2015)*

Low Port Primary School lack of capacity is recognised by WLC and the Scottish Minister. Now the LDP includes six developments within its catchment area, a total of 596 houses. Please note that the following comments were based on a development of 120 houses. Also note that there is an error in the LDP for sites H-LL 7, H-LL 10, H-LL 11, H-LL 12. Their catchment school should be Low Port Primary.

Low Port Primary

“The appeal proposal could be anticipated to generate a total of 38 non-denominational primary school pupils at Low Port. This, for the 2019 school session, would be 34 more pupils than the school’s capacity. Even at the lowest point in the forecast school roll, for the 2020 school session, the capacity would be exceeded by 21 pupils. Such impacts would be exacerbated if pupil numbers from the development were greater than the 38 predicted.”

“In respect of Low Port Primary School, the proposal would be likely to cause the roll of the school to be exceeded by a significant degree. The council’s solution, if the appeal were to be allowed, would likely be a catchment review. The outcome of such reviews, which are subject to statutory consultation, are uncertain. It is not certain that the school could, as an alternative, be extended. There is sufficient uncertainty as to whether the education constraints can be satisfactorily overcome such as that the proposal fails to fully satisfy the requirements of both Policy 7 and Policy IMP 3.”

(Report by [REDACTED], a Reporter appointed by the Scottish Ministers 27 May 2015)

“Of the constraints I have identified, the lack of capacity at Low Port Primary School, and of an established solution to this, is in my view the most significant issue, and in this case an insurmountable one.”

(Report by [REDACTED], a Reporter appointed by the Scottish Ministers 27 May 2015)

WLC’s recent comment of “The school roll may well fall in future years allowing development to take place” is very optimistic given that the proposed developments add 596 houses to the catchment area

High Street Congestion:

This is a major concern and one of the main reasons for the “area of restraint”. No attempt has been made to improve the situation. It appears that computer-modelling software is determining the future of Linlithgow High Street. Just how confident is WLC that this modelling is accurate?

*“The Systra report has shown that the proposed level of development can be accommodated on the network subject to provision of the mitigation measures. The resulting traffic levels will be **no worse than current levels.**” (Comment from WLC, 19/11/2015).*

WLC recognise there is a current congestion problem but rather than attempt to fix the problem they are totally focus on housing development, so Linlithgow gets more houses but the problem with the High Street remains, and if the modelling software is inaccurate then the High Street has an even bigger problem that will have no solution.

Surely the best course of action is to implement the mitigation measures before committing to any developments. The LDP should clearly state that no development would be considered until the mitigation measures have been put in place and proved to be effective.

Air Quality:

This is a major concern and needs to be addressed now before there is any further decrease in air quality. The main source of contaminant come from traffic on the High Street and as such increased traffic from the proposed developments can and will increase these contaminants. An AQMA would be inevitable but could be avoided now by removing developments from the LDP until the mitigation measure are implemented and proved to be effective.

“At Linlithgow High Street measured concentrations of PM10 are equal to the AQS objective and with NO2 concentrations measured close to the AQS objective this is proceeding with a Detailed Assessment.” (2015 Updating and Screening Assessment for West Lothian Council. In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management 26 June, 2015)

The Canal Bridge (Manse Road):

Developments that place additional vehicle and pedestrian traffic on this bridge should be removed from the LDP. In particular for development HH-LL-10 WLC should clearly state in the LDP that no access that will put additional traffic onto the bridge would be considered.

*“The main points for other parties 5.15 The canal bridge junction is very hazardous for school children, despite the crossing patrol. There have been previous crashes and damage to the bridge, and numerous near misses when children have been walking over the bridge. Large lorries cannot cross, and smaller lorries often have to mount the pavement, which has been lowered for this purpose. Poor sightlines mean cars can often meet on the bridge when there is supposed to be priority to those travelling southwards up the hill, leading to a need for evasive action. Pedestrians often have to give way to vehicles bumping onto the pavements. There are very narrow pavements on and to the north of the bridge, as children going to school turn right and then wait in a vulnerable area until traffic clears. **It is especially dangerous with buggies and young children.**” (Report by ██████████, a Reporter appointed by the Scottish Ministers 27 May 2015)*

Please refer to **Police incident number PS20151030-539 van striking buggy on canal bridge Friday 30 October 2015.**

“The proposed development would impact on the safe walking route to local schools, raising road safety concerns on Clarendon Road, Station Road, Back Station Road and the Canal.” (WLC Decision Notice, Refusal of Planning Permission in Principle. 0698/P/13 11/3/2014)

Here is a typical example of the traffic and pedestrians on the bridge. This happen numerous times per day, every day. It is time that WLC carried out inspection from a road safety engineer, but it appears that they will only do this following a request from a parent!



Individual Sites:

The following three sites should be removed from the LDP as they have been badly chosen. *“The sites have been chosen on a sequential testing for sustainable transport”*, badly chosen because WLC have ignore other factors.

All of these sites have the Low Port Primary as their catchment school. Combined all the sites in the LDP add 596 houses to the Low Port catchment area. Some sites now need to be reconsidered.

All of these sites are located behind “single flow” roads and behind B9080 Back Station Road/High Port Signalised Junction, WLC are aware of the current traffic problem at this junction but appear to believe that the mitigation measures will improve this junction despite the fact that their Systra report states otherwise. It should be noted that it only takes 11 vehicles queued south bound to impact the traffic on the High Street.

Their proximity to the High Street roundabout means that they will significantly impact the High Street even after the mitigation measures have been put in place.

1. H-LL 4, Land east of Manse road.

- Places additional traffic onto the Canal Bridge, this is a safety issue.
- Impacted by the Low Port school capacity issues.
- This site will increase congestion at B9080 Back Station Road/High Port Signalised Junction.
- Congestion of the High Street will be impacted.

2. H-LL 10, Clarendon Farm.

- Places significant additional traffic onto the Canal Bridge, this is a **safety issue**. WLC have been asked on numerous occasion to do a risk assessment which to date they have ignored. There are numerous problems regarding access to this site that will be difficult or impossible to overcome. Particularly if access is considered from Clarendon Road, for example the junction layout would need to cross into a field that is part of the conservation area and the farm track that would need to be altered would present a major problem. WLC should refer the recent planning refusal for this site.
- Impacted by the Low Port school capacity issues.
- This site will considerably increase congestion at B9080 Back Station Road/High Port Signalised Junction.
- Congestion of the High Street will be impacted.

H-LL 10 should be removed from the LDP. If WLC cannot accept that this site has been badly chosen then for safety reasons they should:

- Remove the reference to secondary access from LDP page 198 with access only via St. Michael's.
- Given WLC's comment from Chris Nicol "*It is considered that a development of 120 houses can access via an improved hospital access road*"(19/11/2015). Then the transportation section on page 198 should be updated and should read **Access to be via St. Michael's hospital access only.**

3. H-LL 11, Wilcoxholm Farm/Pilgrims's Hill.

- Places additional traffic onto the Canal Bridge, this is a safety issue.
- Impacted by the Low Port school capacity issues.
- This site will increase congestion at B9080 Back Station Road/High Port Signalised Junction.
- Congestion of the High Street will be impacted.