

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 David Liddell, 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 David Liddell, 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 David Liddell, 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 David Liddell, 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.