



Linlithgow & Linlithgow Bridge Community Council

Please reply to:

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Planning Secretary
████████████████████

10th October 2014

Development Planning
West Lothian Council
County Buildings
High Street
Linlithgow
West Lothian
EH49 7EZ

Dear Sirs,

Representations on Main Issue Report pertaining to Linlithgow & Linlithgow Bridge

The following are the representations of Linlithgow and Linlithgow Bridge Community Council. The representations summarise points raised in consultation through a questionnaire, an exhibition attended by 64 residents, a public meeting attended by 51 residents and various individual comments received by e-mail. The following also takes account of the views of representatives of, Linlithgow Civic Trust, Linlithgow Business Association, Linlithgow Development Trust, Linlithgow Cycle Action Group and Transition Linlithgow who with representatives of the Community Council met regularly from March 2014 as the Linlithgow Planning Forum.

Summary

Linlithgow's infrastructure is not adequate to serve current requirements and significant improvements are needed before any housing development is undertaken. The current policy of "restraint" has failed, with 440 homes being constructed over the past 20 years with very few infrastructure improvements. It is essential that issues including High Street congestion and pollution, commuter car parking provision, shopper and visitor car parking provision, provision of adequate facilities for tour coaches, a larger health centre and better routes for walkers and cyclists are all properly resolved and a plan in place before permission is given for housing development. There should be a master plan for Linlithgow that deals with all these issues and developers should be required to contribute towards the cost of making necessary infrastructure improvements.

In detail, the council's suggested housing developments sites are probably those that should be selected, (with the exception of the previous filling station site, Edinburgh Road, EOI-0062) with no other sites being considered for development. A southern High Street relief road from Riccarton Drive to Edinburgh Road is essential with possible additions from Edinburgh Road to Burghmuir and from Bonnytoun to the A706 north of the Loch. Junction 3 on the M9 should be made 4-way. A new health centre should be built on the site of the existing health centre. Additional commuter and shopper/visitor parking should be provided at site EOI-0062 and at the Regent Centre by constructing a 2 level structure over the existing long stay and shoppers' car park. Walking and cycling routes should be reviewed and improved - paths shared by walkers and cyclists should be wide enough to accommodate both. The Vennel area should be completely redeveloped.

Linlithgow has an aging population which is not healthy for the sustainability of the communityⁱ. The reasons for this can be debated but the lack of affordable housing has to be a factor which must be addressed.

Main Issue 1: economic development and growth

- All communities, to be sustainable, must have a plan for economic development and growth. The plan for Linlithgow is neither explicitly nor implicitly contained within the main issues report with the exception of a fleeting reference to tourism.
- There are many hundreds of square feet of office space currently available for rent in Linlithgowⁱⁱ and industrial space within the Oracle Building and at Mill Road. Site EL18ⁱⁱⁱ provides a useful backstop to Mill Road but requires access to the A803 and a four way junction at M9 junction 3.
- There is concern at the number of public sector jobs migrating from Linlithgow to Livingston and elsewhere in West Lothian^{iv}.
- The potential for job creation and training at Beecraigs should not be ignored. The tourist opportunities at Beecraigs could easily be enhanced^v.
- Infrastructure is desperately required to support tourism particularly daytrip tourism. Linlithgow is an attractive destination for e.g. cruise ship outings, tour bus operators, but currently infrastructure is not in place to sustain such visits from daytrip tourists.
- In a recent questionnaire survey 61% of respondents stated that Linlithgow needs additional smaller sized businesses. Working from a home study is a feature of many professionals in Linlithgow but is poorly supported particularly from the perspective of town-wide availability of high-speed broadband and town centre meeting rooms. Encouragement of a co-working hub was mentioned in consultation.

Main Issue 2: community regeneration

- The focus on community regeneration should be directed towards areas of multiple deprivation.

Main Issues 3: housing growth, delivery and sustainable housing locations

- Scenario 3 to provide more housing than the minimum required appears to be a sensible approach to demonstrate clearly the maintenance of a five year effective housing land supply.
- On the basis that the effective housing land supply in Linlithgow has been such a high profile topic in the current planning appeals it seems sensible to emphasise the Linlithgow sites as listed with the exception of EOI - 0062^{vi} which is one of only two feasible sites for a commuter car park. The preferred sites to be built out over the next 10 years or so should be contingent on a master plan for the whole town including improvements to education, health and transport infrastructure.

Addressing questions 29, 30, 31 and 35:

- *Question 29* the definition of Linlithgow as an area of restraint should be removed. It is vital that the future development of the town be planned in a properly developed master plan which matches the build out rate on the proposed sites with infrastructure improvements. Planning permission should be contingent on fulfilling the requirements of the infrastructure improvements contained in the master plan. It is considered that an enforced sequential approach to development is not feasible.
- *Question 30* the demand for affordable housing in Linlithgow should be met by a policy of 25% affordable housing as opposed to the 15% currently. Whilst it is acknowledged that the council development of serviced plots provided by the developer is current Council policy, this policy should not be so applied as to restrict the timely development of affordable housing in partnership with a housing association which in many cases would be the preferred option to ensure low cost housing for sale through the various co-ownership arrangements. For employment land opportunities see Main Issue 1 above.
- *Question 31* land should be safeguarded for west facing slips road at M9 junction 3. Notwithstanding the relief to the congested High St, west facing slips would also improve significantly the attractiveness of business opportunities in the east of the town.
- *Question 35* In private housing situations where the concurrent development of Council housing is not possible due to the timetable embodied in the council house funding programme then social housing/affordable housing should be provided in partnership with the developer and adopted by a housing association for rent and/or co-ownership. A contribution via a commuted sum should be seen as a very last resort. No such commuted sums have ever been spent in Linlithgow.

Note: paragraph 3.86 should be amended since the Council owned Mill Road site has been committed for council house development.

Main Issue 4: infrastructure requirements and delivery

- *Question 38* generally the Council's preferred approach to supporting infrastructure improvements from developer contributions is supported. However, Linlithgow suffers from a backlog of infrastructure improvements which cannot wholly be funded from developer contributions. The town is aware of the significant capital receipts from council property asset sales and commuted sums from developers in the region of £6 million^{vii} and anticipates a favourable approach towards infrastructure improvements.
- *Education* the comments in paragraph 3.88 are acknowledged as is the implication of the construction of the new non-denominational secondary school at Winchburgh. However, housing development and the associated infrastructure improvement in Linlithgow should not be consequent on the build out rate in Winchburgh and a firm date for the commencement of development in Linlithgow should be incorporated in the local development plan.

The commitment to this date also gives a target for the completion of a considered master plan for Linlithgow. In a recent questionnaire survey 73% of respondents stated that the local development plan should address the capacity of Linlithgow primary schools and 81% the capacity of Linlithgow Academy over the planning period.

- *Healthcare* in a recent questionnaire survey 76% of respondents stated that Linlithgow requires a modern health centre capable of holding outpatient clinics. Potentially, this site could accommodate St Michael's hospital. At a recent public meeting it was proposed from the floor that "there is no better site for the health centre than where it is now". This proposition was unanimously supported by the 50+ residents attending the meeting. It would be helpful if the local development plan highlighted the total ground available for a modern health facility.
- *Sports facilities* Linlithgow has only adequate sporting facilities with pitches at Kettilstoun in poor condition and a swimming pool inadequate for serious swimming. However, the promised new extension to Excite and the development of the Kettilstoun sporting facilities by the Linlithgow Development Trust may resolve this. There is adequate land available. Facilities for community clubs and organisations were considered adequate by only 46% of respondents and 61% stated that Linlithgow needs a community theatre/small film studio. While there are a number of uniformed organisations and sports clubs there is limited "drop-in" activity for young people.
- *Question 42* The strategy of "reduce-optimize-invest" is sound but in the context of Linlithgow the following needs to be addressed in the Local Development Plan.

- *Travel in and around West Lothian* whilst the X38 provides a useful West to East 20 minute frequency bus service, public transport within Linlithgow and to other parts of West Lothian is very poor. The 30 minute frequency town bus (LI) does not serve the housing estates to the south of the town. The hourly, somewhat indirect, 31/32 bus service to St John's hospital and Livingston Centre takes 45 minutes, intermediate services via Winchburgh or Bathgate take in excess of an hour. It would be helpful if the Local Development plan made a commitment to improving north to south travel in West Lothian and particularly to Livingston.
- *Road and rail* there are four variables within the road and rail equation.
 - Linlithgow rail station is the busiest in West Lothian by a significant margin. The Office of Rail Regulation records 1,138,678 passenger movements through Linlithgow station in 2012^{viii}. The success of Linlithgow station will be enhanced with electrification and longer platforms accommodating longer and more frequent trains. A significant increase in commuting through Linlithgow station has been noted resulting from the extensive residential development in Bo'ness. This will undoubtedly increase with the planned developments at Winchburgh and Whitecross. Facilitating walking and cycling are options only open to Linlithgow residents. The problem of commuter parking can only grow. The development plan must include a solution to commuter parking. 71% of respondents to a recent questionnaire state that additional all-day commuter parking is required and should be planned for. At first sight EOI-0062 and a two level car park at the Regent Centre appear the only feasible options.
 - The lack of short stay parking in the town centre for residents and visitors compromises High St businesses. In the same survey mentioned above 81% of respondents stated that additional short stay parking is required.
 - Linlithgow is unique in terms of West Lothian towns for having no alternative route to the High St and having restricted access for double deck buses and high sided trucks. New High St relief roads are required to the north, east and/or the south of the town. 73% of questionnaire respondents consider this the only option to relieve the High St. The development plan should include for a commitment to such relief roads.
 - The absence of West bound slips at M9 junction 3 compromises commercial and residential development. These must be included in any future plan.
- Policy TRAN34 is considered unfulfilled and should be retained. Further traffic studies are required building on the innovative Halcrow Fox Access Study (1995) which has remained largely ignored for nearly 20 years.
- *Question 43* Failure to provide a new rail station at Winchburgh will add to the problems described above. A contingency plan should be incorporated in the development plan for the short term and/or long term demands for parking at Linlithgow Station by new Winchburgh residents.

Main Issue 5: town centres and retailing

Question 45 the preferred approach including removing the retail policy restrictions currently in place in Linlithgow town centre appears sound.

Main issue 6: the natural and historic environment

Question 48 the preferred approach to housing development land appears sensible and conducive to appropriate development on the perimeter of Linlithgow.

Question 71 the preferred approach to historic environment in West Lothian appears appropriate. Paragraph 3.202 regarding the site of the battle of Linlithgow Bridge is noted with approval. The open space strategy should include the safeguarding of the site and the potential of transferring the battle site into trust. Linlithgow Palace and Loch are the “jewel in the crown of Linlithgow” the heritage and tourist industry aspects of which should be significantly enhanced for the recreational and commercial benefit of Linlithgow. This should be included in the Development Plan as a policy objective.

Although not strictly under this question it should be noted that Council owned open space in Linlithgow scores only just above average in the open space strategy document with public parks having “a poorly maintained appearance”. The pathway to and maintenance of the site of the Carmelite Friary is an example.

Beebraigs falls with the Linlithgow and Linlithgow Bridge Community Council area but is not mentioned at all in the Main Issues Report. Beebraigs is a major asset but requires further multi-user paths which should be included in the LDP.

Linlithgow is reasonably well served by paths away from traffic, mostly because of the canal towpath and the Loch and Peel. However, there are a number of missing links which could easily be provided, for example the few hundred metres between the end of the Kingsfield path and the canal towpath and the potential route between the canal towpath and Beebraigs via Parkley Place. In a similar manner cycling routes through the town are poor, the High St is inaccessible (safely) by cycle which is a primary disadvantage. Further studies to develop a core path plan for pedestrians, cyclists and disabled should be a part of the LDP.

Question 80 the preferred approach to the Union Canal as regards its tourism and recreational potential is appropriate. However, the recent planning approval for the siting of residential barges to the east of the Manse Road bridge could be considered inappropriate. A policy is required on the proper siting of residential barges and these sites should be included in the development plan. The Community Council strongly argued for the siting of residential barges in Linlithgow on the offside close to the Edinburgh Road aqueduct. In the event this argument was lost because it was cheaper to site the barges adjacent to the towpath close to Manse Road.

Main issue 7: climate change and renewable energy

Question 86 the preferred approach seems appropriate. However, some consulted consider that a plan which identifies natural energy sources (solar, hydro, geothermal, etc) should be in place for Linlithgow (and other communities in West Lothian). At the very least there should be a plan to adopt a standardised methodology for determining such sources of energy and facilitating their capture.

Question 92 in Linlithgow concerns over air quality relate primarily to vehicle emissions in the High St. Actions to encourage a reduced amount of traffic to proceed smoothly through the High St would largely resolve this problem. Strategies to accomplish this should be included in the development plan.

Main issue 8: minerals and waste

Question 97 the preferred approach to waste management appears appropriate.

Not all questions have been answered but we believe that the above captures the issues relating to Linlithgow and Linlithgow Bridge.

Yours faithfully



ⁱ see census 2001 and census 2011. Population 13,370 in 2001; 13462 in 2011. Age group 45-74 31.6% in 2001; 40.1% in 2011.

ⁱⁱ see http://www.novaloca.com/commercial-property/Lothian_Linlithgow

ⁱⁱⁱ see <http://www.westlothian.gov.uk/CHttpHandler.ashx?id=4631&p=0>

^{iv} Permanent and temporary relocation of staff from County Buildings and the move of the Sheriff Court and Procurator Fiscal's office to Livingston are examples.

^v Long Term Forest Plan for Beecraigs Country Park - West Lothian Council

^{vi} Edinburgh Road former filling station see <http://www.westlothian.gov.uk/CHttpHandler.ashx?id=4631&p=0>

^{vii} communication from Hugh Scott, West Lothian Council in response to a question from the Community Council, capital receipts and developer contributions since 1st April 1996.

^{viii} see <http://orr.gov.uk/statistics/published-stats/station-usage-estimates>