



LINLITHGOW CIVIC TRUST

E

15th October 2014

WLC REF: MIRQ0110

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

Dear Sirs,

Linlithgow Civic Trust was formed in 1971 and aims to encourage the conservation of the town's built and natural heritage. It makes its views known on planning applications and development proposals likely to have a significant impact on the Royal Burgh of Linlithgow.

The following are the representations of Linlithgow Civic Trust regarding the Main Issues Report that was published earlier this year. This submission takes into consideration the Trust's own views as well as those of Linlithgow and Linlithgow Bridge Community Council, Linlithgow Business Association, Linlithgow Development Trust, Linlithgow Cycle Action Group and Transition Linlithgow who met regularly as the Linlithgow Planning Forum.

The Trust's main concerns are:

- The draft proposals' map in the Main Issues Report (MIR) appears to allocate housing areas in isolation from associated infrastructure such as roads. Linlithgow's infrastructure is not adequate to serve current requirements and significant improvements are needed before any further housing development is undertaken.

- The current policy of "restraint" has failed. It is estimated that 440 homes have been constructed over the past twenty 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 resolved and a plan put in place before permission is given for further housing developments. Linlithgow Civic Trust considers that the preparation of a comprehensive master plan for Linlithgow is an essential prerequisite for future development within the town dealing with all these issues. As outlined in its 'Vision for Linlithgow 2011-30', <http://www.lct.org.uk/planning/vision2.htm>, the Trust considers that no further infill housing development and no expansion whatsoever is acceptable unless it forms part of a comprehensive plan which forces developers to carry out the priority community requirements identified.

- The Council's suggested housing developments sites may form the basis of those that should be selected, (with the exception of the petrol filling station site, Edinburgh Road, EOI-0062) but their boundaries should be refined in relation to landform, road alignments, etc.

- Relief roads are required to reduce the congestion and pollution in the High Street.

A relief road from Riccarton Drive to Edinburgh Road is essential with a related road linking from Edinburgh Road to Burghmuir. Additionally a relief road from Bonnytoun to the A706 north of the Loch should be provided. To augment the value of these relief roads the Trust considers that junction 3 on the M9 should be made four-way interchange.

- A new health centre should be built at the same location in the town.

- Additional commuter, shopper and visitor parking should be provided at site EOI-0062 (along the Edinburgh Road) and at the Regent Centre by constructing a two-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.

- The lack of social rented housing requires to be addressed, none having been provided since the abolition of Linlithgow Town Council in 1971, and the waiting time for a council house being over ten years.

We amplify our concerns in respect of the Questions posed in the MIR questionnaire as follows:

Main Issue 1: Economic Development and Growth

- To be sustainable, communities require a plan for economic development and growth. Such a plan for Linlithgow is neither explicitly nor implicitly contained within the Main Issues Report with the exception of a fleeting reference to tourism.

- Hundreds of square feet of office space are currently available for rent in Linlithgow as well as industrial space within the Oracle Building and at Mill Road. Site EL18 (off the Blackness Road, near junction 3 of the M9), provides an area of potential to the east of the town, to Mill Road but requires access to the A803 (Blackness Road) and would benefit from a four-way junction at M9 junction 3.
- The Trust is concerned at the loss of public sector jobs, particularly if the permanent closure of the County Buildings was to be contemplated.
- Infrastructure is desperately required to support tourism, particularly day visits. Linlithgow is an attractive destination for, e.g. cruise ship outings, tour bus operators, but currently facilities not in place to sustain such visits from daytrip tourists. The Trust wishes to see the potential realised of the historic birthplace of Mary Queen of Scots, at Linlithgow Palace, but this is not reflected in the MIR proposals.

Main Issues 3: Housing Growth, Delivery and Sustainable Residential Locations

- The Trust considers that 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 subject to refinement by a masterplan. The Civic Trust considers it is essential that the necessary roads and other infrastructure are constructed before further residential developments are permitted. See the introduction above.

Addressing questions 29, 30, 31 and 35:

- Question 29. The Trust considers that the definition of Linlithgow as an area of "restraint" should be removed. However, the Trust is strongly of the opinion that it is vital that future development of the town should be planned in a co-ordinated developed master plan that 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. The Trust considers that an enforced sequential approach to development and related infrastructure is desirable.
- Question 30. The Trust considers that the demand for affordable housing in Linlithgow should be met by a policy of the current 15% social rented housing. 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 timeous development of affordable housing.
- Question 31. The Trust considers that land should be safeguarded for west facing slips road at M9 junction 3. Notwithstanding the proposed 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. The Trust considers that in private housing situations where the concurrent development of Council housing is not possible in the Council house programme then social housing/ affordable housing should be provided. This should be 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.

Main Issue 4: Infrastructure Requirements and Delivery

- Question 38. The Trust considers that generally the Council's preferred approach to supporting infrastructure improvements from developer contributions should be supported. However, Linlithgow suffers from a backlog of infrastructure improvements which may not be wholly funded from developer contributions and should be funded from past capital receipts from the sale of council property and past computed sums received by the Council.
- Education. The Trust acknowledges the comments in paragraph 3.88 including 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 Development Plan.
- The Trust considers that the over-stretched and low efficiency health centre should be replaced at the same location within the planned period, particularly if more houses are constructed and the population rises, with a modern health centre capable of holding outpatient clinics.
- Sports and leisure facilities. Current deficiencies in sporting facilities are being addressed, but the Local Development Plan should allow for the provision of more facilities for community clubs and organisations and the provision of a community theatre/ cinema in accordance with local aspirations.
- Question 42. The Trust considers that 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 twenty minute frequency bus service, public transport within Linlithgow and to other parts of West Lothian is considered very poor. The thirty minute frequency town bus (LI) does not serve housing 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.
 1. Linlithgow Railway Station is the busiest in West Lothian by a significant margin and the problem of commuter parking in Linlithgow is only likely to grow. The Development Plan should include a solution to commuter parking. At first sight EOI-0062, at Edinburgh Road, and a two level car park at the Regent Centre appear the only feasible options.
 2. The lack of short stay parking in the town centre for residents and visitors compromises High Street businesses.

3. Linlithgow is unique in terms of West Lothian towns for having no alternative route to the High Street and having restricted access for double deck buses and high sided lorries. New High Street relief roads are required to the north, and east/ south of the town. The Trust considers that the Development Plan should include for a commitment to such relief roads.
 4. The absence of west bound slips at M9 junction 3 compromises commercial and residential development. These should be included in the Plan.
- Policy TRAN34 is considered unfulfilled and should be retained. Further traffic studies are required building on the innovative 1995 Halcrow Fox Access Study.

Question 43. Failure to provide a new railway station at Winchburgh would add to the problems described above.

Main Issue 5: Town Centres and Retailing

Question 45. The Trust is in agreement with the preferred approach including removing the retail policy restrictions currently in place in Linlithgow town centre.

Main Issue 6: The Natural and Historic Environment

Question 48. As above, Linlithgow Civic Trust considers that the preparation of a comprehensive master plan for Linlithgow is an essential prerequisite for future development within the town dealing with all these issues.

Question 71. A principal objective of the Trust is: to stimulate public interest in, and care for, the beauty, history and character of Linlithgow and its surroundings. Linlithgow Palace, Peel and Loch are the “jewels in the crown of West Lothian”, the heritage and tourist industry aspects of which should be significantly enhanced for the recreational and commercial benefit of Linlithgow. Attention should be extended to surrounding areas in particular the eastern approach to the town, Cockleroy and the Bathgate Hills.

The Trust wishes to see the existing historic townscape retained and improved and seeks high standards of new design and the provision of high quality public realm to enhance Linlithgow's two conservation areas.

More could be made of empty shops and premises within the historic high street area.

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 a trust. These should be included in the Development Plan as a policy objective.

The existing combined sewage/ drainage system in Linlithgow is already unable to cope under current circumstances. When the combined sewer and surface water exceeds the pipe capacity, then the excess is diverted directly into the Loch. The Trust considers this unacceptable and requires that improvements are included to improve the water quality of Linlithgow Loch, including the connection of all properties in the Edinburgh Road area to the public sewer as an element of infrastructural ‘planning gain’ – currently the effluent from the septic tanks in this area is the most significant pollutant of Linlithgow Loch.

Linlithgow is reasonably well served by paths away from traffic, mostly because of the canal towpath and the Loch and Peel. Some cycling routes through Linlithgow are hazardous and the high street is difficult to cycle along safely. Further studies to develop a 'core path plan' for pedestrians, cyclists and disabled should be a part of the Development Plan (see the Trust's Vision).

Question 80. The Trust considers that the preferred approach to the Union Canal, as regards its tourism and recreational potential, is appropriate, although there could be more specific provision for boat mooring and associate facilities in or near Linlithgow. However, the recent planning approval for the siting of residential barges to the east of the Manse Road bridge is considered inappropriate. A policy is required on the proper siting of residential barges and these sites should be included in the Development Plan.

Main Issue 7: Climate Change and Use of Renewable Energy

Question 86. The Trust considers that the preferred approach seems appropriate. The Trust is aware that there is opinion within the town to consider a plan to develop natural energy sources, such as solar, hydro and geothermal in place in Linlithgow.

Question 92. The Trust has concerns regarding the poor air quality resulting from vehicle emissions in the High Street. Actions to encourage a reduced amount of traffic to proceed smoothly through the High Street would largely resolve this problem. Strategies to accomplish this should be included in the development plan.

In conclusion, Linlithgow Civic Trust is of the strong opinion that a master plan for Linlithgow should be prepared to deal with all these issues. The Trust argues that developers should be required to contribute towards the cost of making the necessary infrastructure improvements and that all new housing developments should be co-ordinated such that these improvements are made at the outset. The Trust considers that no further housing development whatsoever is acceptable unless it forms part of a comprehensive plan which forces developers to carry out the priority community requirements identified in the Trust's Vision for Linlithgow or a similar approach.

Yours faithfully,



Chair, Linlithgow Civic Trust

chair@lct.org.uk