

WLC REF: MIRQ0216

West Lothian Local Development Plan Main Issues Report consultation

Response from West Lothian Health Improvement Health Inequalities Alliance

Thank you for the opportunity to comment on the West Lothian Local Development Plan Main Issues Report (MIR). The West Lothian Health Improvement Health Inequalities Alliance includes representatives from West Lothian Council, West Lothian Community Health and Care partnership, NHS Lothian and the local voluntary sector.

We commend many aspects of the MIR: commitment to placemaking; emphasis on active travel and integrated transport infrastructure; good quality housing; commitment to reduce air pollution; flood risk management; sustainability. There are, however, some elements of the MIR that we think are unclear or, in some instances, missing. We have tried to group our comments under the main themes in the MIR although some of our points are relevant to more than one issue.

Main Issue 2: Community Regeneration

We support the regeneration focus on areas that rank highly in the Scottish Index of Multiple Deprivation (SIMD). However, there are parts of Livingston which rank highly on SIMD and we think these areas -- Craigshill, Dedridge, Eliburn, Knightsridge -- should be included in the priority list.

A significant number of people living in deprived circumstances do not live in areas ranked highly on SIMD. Focusing regeneration investment in areas of multiple deprivation should be complemented by services and facilities designed to be responsive to the needs of the population throughout West Lothian.

Main Issue 3: Housing Growth, Delivery and Sustainable Housing

Main Issue 4: Infrastructure Requirements and Delivery

We support the commitment to ensuring adequate housing supply and the related commitments to mixed tenure and placemaking. We also support the proposal to review the Affordable Housing requirement. We would encourage the council to consider increasing the Affordable Housing requirement to 25% as homelessness remains a considerable problem in West Lothian. There are clear and very negative health consequences associated with homelessness.

In relation to the provision of health and care services, we think that the sentence in section 3.125 saying that 'the delivery and implementation of new provision is ultimately dependent on business decisions of individual practices and those of the NHS and the Community Health Care Partnership' should be revised. Although many GP practices will continue as small businesses, the relationship between NHS and West Lothian Council services will be significantly changed due to the *Public Bodies (Joint Working) (Scotland) Act 2014*. This Act has established that health and social care will be delivered by integrated NHS and council partnerships from 2015; these new partnerships will have responsibility for funding and providing primary and community based care facilities and services. The *Community Empowerment (Scotland) Bill 2014* also places a greater onus on community planning and responsive local services. Health and social care infrastructure should be included as a Developer Contribution because new housing and new residents create demands on health

and social care infrastructure in just the same way as they create demands on schools, traffic management, transport improvements and green space.

It is also imperative that housing developments are supplemented by suitable community infrastructure. It would be a concern if new developments do not include resources designed to foster a sense of local identity or community. Although West Lothian has good external connectivity, it should not come at the expense of thriving local communities. It is important that developments such as Heartlands or Winchburgh do not become dormitory suburbs or residential islands with no services or infrastructure in which new residents and established residents have nothing in common. There should be meeting places and spaces to allow community capacity and networks, which are important determinants of health and wellbeing, to be developed.

We note proposals to allow development in Linlithgow. Any development must take into account consequent new demands on services, notably health and social care. But we also think that the link between air quality in the town and development needs to be taken very seriously. In section 3.88 of the MIR, it is stated that a study will be commissioned to investigate the cumulative impact of new development proposals on air quality. We suggest that this should be an independent report commissioned by the council with input from appropriate academic experts. The report should not be a rubber-stamping exercise to permit development.

The MIR says many positive things about integrated transport infrastructure and development of walking and cycling routes. We support these ideas. We note the comments in section 3.146 about shortcomings in north-south transport. But there is no mention of this in the Preferred approach. It would be helpful to highlight this issue so that it is foregrounded in future West Lothian Council thinking about transport.

Main Issue 5: Town Centres and Retailing

Main Issue 6: The Natural and Historic Environment

We support the MIR's approach to safeguarding and promoting a range of town centres. Although town centres must be a focus for services and retail, it has been noted that some places, notably Livingston centre, do not contain provision for people to stop and sit. Greenspace has clear therapeutic benefits and these are important for people living, working and shopping in retail centres as much as in suburban environments. Town centre developments should include provision for greenspace as well as public transport infrastructure and car parking.

Main Issue 8: Minerals and Waste

We note that section 3.242 mentions the possibility of fracking in West Lothian. It will be important to have guidance in place before applications are made rather than ad hoc policymaking. There have been some concerns related to health impacts from shale oil drilling which has not been regulated properly.^{1,2} This should not be allowed to happen in West Lothian.

Selected References

1. Finkel ML, Law A. The rush to drill for natural gas: a public health cautionary tale. *Am J Public Health*. 2011; **101**(5): 784-5.

2. Kovats S, Depledge M, Haines A, Fleming LE, Wilkinson P, Shonkoff SB, et al. The health implications of fracking. *The Lancet*. 2014; **383**(9919): 757-8.