



West Lothian Council  
Development Management  
15 Oct 2014  
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October 11, 2014

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

**West Lothian Local Development Plan**

Objections to the West Lothian Local Development Plan, Main Issues Report proposals for Linlithgow

Dear Sir/Madam:

We object to the current proposals for Linlithgow as follows.

1. Development on prime agricultural land

Some of the larger sites with "preferred" status such as at Preston Farm are on prime quality agricultural land. The use of this type of land is undesirable because we need to protect agricultural soils for future food production. Sites on prime agricultural land should only be developed as an absolute last resort when there are no alternatives anywhere in West Lothian. The Council has already approved vast areas within the authority for housing development through its programme of CDAs. These developments will satisfy much of the overall need for new housing in the Authority. We should not be encouraging further development on prime agricultural land, by re-zoning it for development.

2. Traffic congestion

There are a number of serious issues with traffic congestion and road safety that require to be addressed before any further major housing development is approved. The congestion in the High Street must be resolved prior to any further development being sanctioned, not just in response to developments to the east of the town.

The development sites to the south of the town at Preston Farm and the Clarendon area are likely to cause traffic and road safety problems on Preston Road and Manse Road. Both these roads take ever increasing through traffic from the Livingston area, particularly when people are going to and returning from work. Manse Road is severely restricted at the canal bridge. Preston Road is particularly congested at the beginning and end of the school day. The section of the road between the canal bridge and Braehead Road junction, is virtually impassable, due to parents parking either side of the road when delivering and collecting their children to the two primary schools. In addition, large numbers of pupils from the Academy cross Preston Road between the Braehead Road junction and the High Street. This is currently a major child safety problem, which further housing developments, particularly at Preston Farm, will exacerbate.

### 3. Landscape

The development of the "preferred site" at Preston Farm will have a seriously detrimental effect on the town's setting within the rural landscape and its relationship to Cockleroy hill. The Council's Strategic Environmental Assessment describes this site as "flat and slightly sloping". This is not an accurate description. The 1:25000 Ordnance Survey map shows a drop of approximately 25 to 30 metres across the site, approximately 1 in 8 fall. The SEA also states "Although the site forms part of the AGLV it is relatively self-contained and would not be visible from the wider area to the south." It fails to point out that the site is clearly visible from the main approaches to Linlithgow from the west. The visual impact of the site is due to its pronounced slope to the north and its proximity to the horizon. From the approaches to Linlithgow, the site presents itself as a wide expanse of rural countryside, separating the mature deciduous tree belt, visually at the foot of Cockleroy, from the town. See attached photographs.

Site at Preston Farm (proposal is to rezone all of this field for housing)



View of site EOI-016, Land at Preston Farm, taken from the east bound layby on the A803

Proposed site extends from Donaldsons School to Preston Glen



View approaching Linlithgow Bridge on the A803

Another area of concern is the effect this development will have on the setting of Preston House. Preston House is a country house in a rural setting. Recent developments in its grounds have been carefully designed so that this is not destroyed. Development of this site will effectively subsume this country house into an urban sprawl.

#### 4. Environment

Some of the proposed development sites, which have been given "preferred site" status, score poorly in the Council's Strategic Environmental Assessment (Section 10.0 Appendix 2B). In particular site EOI-0168 Land at Preston Farm Linlithgow fails 12 out of 23 assessment criteria for "significant adverse effects". This is the highest failure rate of all the proposed "preferred sites" for West Lothian and is significantly higher than the majority of the "not preferred sites". Site EOI-0210 Land at Clarendon Farm, also scores poorly with a failure rate of 11.

Sites such as at Preston and Clarendon, where the Assessment concludes that development will have significant adverse effects on the environment, should not be given "preferred site" status.

We would also wish to advise you that we have not used the Main Issues Questionnaire to comment on the proposed new Local Plan. This document is not fit for purpose. The form of the questionnaire is leading. The "alternative approach" is frequently qualified with a negative statement. The wording and content of the proposed strategies is overly complex and frequently vague and often requires an in depth knowledge of background reports and policies to enable an educated response. This is not a document that will engage the public and is therefore a flawed tool for public consultation.

Yours faithfully,

