



# Linlithgow & Linlithgow Bridge Community Council

Please reply to:

Dr John R Kelly  
Planning Secretary  
C/o 8 Pilgrims Hill  
Linlithgow  
EH49 7LN  
01506 843160

19<sup>th</sup> November 2015

Development Planning and Environment Manager,  
West Lothian Council  
West Lothian Civic Centre,  
Howden South Road,  
Livingston,  
West Lothian,  
EH54 6FF

Dear Sirs,

## **West Lothian Council - Local Development Plan Consultation Response**

This is an objection from Linlithgow and Linlithgow Bridge Community Council to West Lothian Council's Local Development Plan (LDP). The objection collates background research, the comments of the Linlithgow Planning Forum and the public responses noted at the Linlithgow: A Plan for the Future exhibition on 17<sup>th</sup> November 2015 held at Low Port Centre. This objection comprises; this letter, together with Appendix A (Linlithgow: A Plan for the Future) and Appendix B (Results of a consultation questionnaire). This letter and the two appendices should be read together as they contain the entire argument for the objection.

Our primary objection to the LDP as it pertains to Linlithgow is its approach to the resolution of Linlithgow's problems through a reactive determination of housing sites based upon enclosing within the settlement boundary those fields which have been selected from the call for sites. In some cases the selection of fields for development ignores factors such as topography, areas of great landscape value, proximity to the town centre and impact on existing infrastructure. It our view that the settlement boundary should not be determined by development opportunity and land ownership but should delineate Linlithgow in terms of the best settlement area conducive to the landform and existing plus proposed infrastructure.

In more detail it is our view that:

- The proposed settlement boundary should be a defensible boundary and should:
  - Exclude the Kettlistoun playing fields
  - Exclude the Preston Farm field adjacent to Deanburn Road
  - Include the development area in the south eastern quadrant of Linlithgow to give adequate land for housing development for 15 to 20 years including an eastern distributor road to be financed by development.
- The proposed development areas in the LDP appear to leave the discussion of infrastructure, principally roads, to the planning application. We would prefer to see the indicative road layout as part of the LDP such that developers can appreciate the extent of the required commitment to roads and other infrastructure from the outset. Alternatively, the LDP should make reference to a masterplan for Linlithgow to be included in Supplementary Planning guidance to be issued before end 2016.
- The LDP should detail the projected plan for the High St including proposals for a High St relief road and traffic management measures to improve the environment and air quality for pedestrians and cyclists.
- Plans for an improvement to town centre parking are of primary importance and should be described in the LDP and detailed in the masterplan.

Our specific objections to the LDP are listed below and our suggestions are outlined in the Linlithgow: A Plan for the Future document enclosed with this letter as Appendix A. Our suggestions are informed *inter alia* by the feedback from 123 attendees at the Plan for the Future exhibition and 73 completed questionnaires which overwhelmingly support the proposals contained in Linlithgow: A Plan for the Future.

You should note that, for a number of reasons, attendees at the exhibition reported that they were unable to use the feedback portal on the West Lothian Local Development Plan website.

## Specific Responses to the LDP

Please note that statements paraphrased from the LDP are in *italic* and statements quoted are in "*italic and in quotes*". All vision and aim statements are from the LDP.

### LINLITHGOW: ECONOMIC DEVELOPMENT, TOWN CENTRE DEVELOPMENT & RETAILING

✓ = Agreed    C = caveat (agreed in principle but with reservations)    X = Disagree for reasons stated

#### Summary of Proposed LDP Policy:

|               |   |   |
|---------------|---|---|
| <b>Vision</b> | ✓ | Establish an improved employment position within a more diversified local economy.  |
| <b>Aim</b>    | ✓ | <ul style="list-style-type: none"> <li>• Provide an adequate and diverse range and quality of employment land and maintain Linlithgow's attraction as an area which provides a</li> </ul> |

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|              |   | <p>range of choice for those wishing to invest and do business</p> <ul style="list-style-type: none"> <li>• Promote Linlithgow as an attractive tourist destination</li> <li>• Promote the development of Linlithgow town centre and consolidate and enhance Livingston's role as a sub-regional retail and commercial centre.</li> </ul>   |
| <b>EMP 6</b> | ✓ | <i>Office development (as defined by Class 2 of the Use Classes (Scotland) Order (1997)) will be supported in town centres</i>  |
| <b>EMP 8</b> | ✓ | <p><i>"New, or expanded tourism-related development, will be supported where it is capable of strengthening the appeal and attraction of West Lothian to a wide range of visitors, thereby contributing to the greater West Lothian economy".</i></p> <p>This in particularly important for Linlithgow.</p>   |
| <b>EMP 9</b> | X | Missing. A policy to encourage the use of vacant premises. In Linlithgow this means Oracle in particular. There is a view in Linlithgow that potential new occupants are either put off by the lack of a 4-way junction at M9 junction 3 and/or potential occupants are steered towards Livingston.   |
| <b>TCR 1</b> | C | <p><i>Proposals for retail, offices, business, community, leisure and recreation, visitor locations and higher density residential uses will be supported in Linlithgow where it can be demonstrated that the proposal is of the scale and type commensurate to the centre's role.</i></p> <p>There should be a statement referring to the Linlithgow masterplan as below.</p>  |
| <b>5.15</b>  | ✓ | <p><i>The council's West Lothian Economic Strategy 2010-20 focuses on three key strategic drivers:</i></p> <ul style="list-style-type: none"> <li>• <i>developing the business base;</i></li> <li>• <i>maximising West Lothian's competitiveness as an investment location; and</i></li> <li>• <i>realising the potential of young people.</i></li> </ul>   |
| <b>5.26</b>  | X | <p><i>The rise in home working and diversification into e-business, assists in promoting sustainable development patterns and supporting work/life balance. The LDP provides support in principle to encouraging local diversification for a range of small and start-up businesses which are based in the local community, principally through extensions and modifications to existing homes.</i></p> <p>This aim is incomplete without the provision of a business centre in Linlithgow town centre providing meeting rooms with coffee/tea facilities, printing and most importantly socialisation.</p> |

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| 5.27  | X | <p><i>While it is not possible to identify specific types of new tourist attractions which may seek to locate in West Lothian the council is supportive, in principle, of enhancing the area's tourism potential. This includes new hotels in sustainable and accessible locations within the M8 corridor.</i></p> <p>The focus is on new tourist attractions within the M8 corridor and ignores the existing potential within Linlithgow.</p>   |
| 5.135 | X | <p><i>"West Lothian has five traditional town centres - Armadale, Bathgate, Broxburn/Uphall, Linlithgow and Whitburn. The council has approved public realm design guides for all these centres with the exception of Linlithgow. The guide establishes a framework for public realm investment and the basis for the town centre improvement works. A design guide for Linlithgow is to be prepared".</i></p> <p>The current public realm study is too focused on the High St . There should be a whole of Linlithgow Masterplan which should be agreed with residents before any further development is entertained.</p> |

### Review of Relevant Sections of West Lothian Economic Strategy 2010-20 - Linlithgow

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|-----------|---|--|
| Page<br>3 | X | <ul style="list-style-type: none"> <li>• <i>Attract professional business services to Livingston and traditional town centres.</i></li> <li>• <i>Promote the M8 corridor as the 'must have address' for key industries.</i></li> </ul> <p>Whilst attracting professional businesses to Linlithgow, as a traditional town centre, is supported the Aim to promote the M8 corridor somewhat excludes Linlithgow.</p>   |
| Page<br>5 | X | <ul style="list-style-type: none"> <li>• <i>Grow from 'living in' to 'working in' Linlithgow</i></li> <li>• <i>Create an integrated and sustainable transport infrastructure</i></li> <li>• <i>Join up the visitor offering and maximise the potential of Linlithgow town centre</i></li> <li>• <i>Encourage interest from hotel chains in developing more hotels along the M8 corridor and build bed-nights</i></li> <li>• <i>Support Visit West Lothian to develop tourism in Linlithgow and work strategically with Edinburgh and the Lothians</i></li> <li>• <i>Improve and promote Linlithgow as a retail, leisure, employment and visitor locations.</i></li> </ul> <p>Whilst the majority of the objectives are supported, the focus on the M8 corridor may lead to the conclusion that only lip service is being paid to Linlithgow. It would be helpful if the plan were supplemented by Key Performance Targets.</p> |

## LINLITHGOW: HOUSING

✓ = Agreed C = caveat (agreed in principle but with reservations) X = Disagree for reasons stated

### Summary of Proposed Policy:

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|---------------|---|--|
| <b>Vision</b> | ✓ | There will be a greater choice of housing options available, supported by the full range of education, community, health, retail, recreation and leisure facilities and a network of open spaces.  |
| <b>Aim</b>    | ✓ | Provide a generous supply of housing land and an effective five year housing land supply at all times.   |
| <b>HOU1</b>   | ✓ | <i>Developments on the sites indicated on the proposals map will be supported in principle for housing only, subject to a few exceptions.</i>  |
| <b>HOU2</b>   | ✓ | <i>The council will endeavour to maintain an effective 5-year housing land supply. Sites will be subject to phasing and annual review. Development proposals in advance of an identified shortfall in the land supply described in the LDP will be deemed to be pre-mature.</i>  |
| <b>HOU3</b>   | ✓ | <i>In addition to the sites described in HOU1 new housing development will be supported on sites within settlement boundaries subject to a number of provisions.</i>   |
| <b>HOU4</b>   | C | <i>Proposals for windfall housing development within the settlement boundary of Linlithgow/Linlithgow Bridge will be subject to additional scrutiny and will only be supported where it can be demonstrated that <del>their</del> any adverse impact can be mitigated by additional investment and/or <del>impact can be</del> satisfactorily managed and <del>such that the proposed development</del> would not singularly or cumulatively disadvantageously affect; heritage, environment, free movement of pedestrians and cyclists, traffic <del>congestion</del> flow and parking, and/or education capacity.<br/>This policy needs rewording as suggested by adding phrases in red. (note: double negative to be removed “would not ...disadvantageously affect....congestion”)</i> |
| <b>HOU5</b>   | ✓ | <i>Linlithgow is a LHS Priority 1 Area. As such 25% of all development must be affordable and the threshold for commuted sums is &lt; 25.</i>  |
| <b>HOU6</b>   | ✓ | <i>No sites identified for Gypsies, Travellers and Travelling Show People. Proposals for such sites to meet strict conditions.</i>   |
| <b>HOU7</b>   | ✓ | <i>Proposed sites for residential care facilities will be supported in specific circumstances.</i>   |

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| <b>HOU8</b> | ✓ | <i>Where a development leads to a shortfall in capacity, quality or location of health service provision identified by NHS Lothian and/or community facilities identified by the council, an appropriate developer contribution may be sought.</i> |
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All the above policies are agreed. Policy HOU3 would be enhanced if the settlement boundary were to follow landform rather than current field boundaries and if the proposed access roads and relief roads were shown. A masterplan is required.

### Local Development Plan Proposals for Linlithgow with proposed comments

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| <b>5.34</b> | X | <p><i>“A typical characteristic of [Addiewell, Armadale, Bathgate and Boghall, Blackburn, Blackridge, Breichis, Fauldhouse, Loganlea, Stoneyburn, Whitburn and other settlements in the Breich Valley] is a significant imbalance between public and private sector housing and it is one of the council’s ambitions to achieve a more diverse housing mix in order help create more socially and economically balanced communities”.</i></p> <p>As West Lothian Council, and its predecessor, has sold over half of the council housing in Linlithgow there is currently an imbalance between social rented and owner occupied housing. A better mix should be encouraged particularly through Housing Association intervention/contribution. The only option for most young families is private rental.</p>               |
| <b>5.35</b> | X | <p><i>“The council is also mindful of the continuing need and demand for social housing”</i></p> <p>This should include Linlithgow which is currently specifically excluded in the text.</p>  |
| <b>5.37</b> | ✓ | <p>The key objectives for the LDP with regard to housing growth are agreed with specific reference to Linlithgow:</p> <ul style="list-style-type: none"> <li>• <i>To support sustainable development goals and maintain and enhance the character and identity of Linlithgow</i></li> <li>• <i>To ensure that necessary social and physical infrastructure accompanies growth;</i></li> <li>• <i>To allow for a range of house types and sizes across all sectors;</i></li> <li>• <i>To achieve and maintain a minimum of 5 years effective housing land supply within the proposed Linlithgow settlement boundary;</i></li> <li>• <i>To have regard to significantly increased demand for rented housing; and</i></li> <li>• <i>To deliver affordable housing, particularly in the areas of highest demand.</i></li> </ul> |

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| 5.63           | ✓ | It is agreed that the "area of restraint" designation previously applied to Linlithgow is removed.  |
| 5.64           | X | <p><i>"housing development can only proceed once secondary school capacity is available and it is therefore unlikely that land will be released before 2019 given the current education constraints".</i></p> <p>The Minister appointed reporters in the two recently heard appeal cases rejected the premise that secondary education capacity was a constraint to development. This sentence should be replaced by "housing development can only proceed following an explicit plan for infrastructure improvements including; roads, parking, drainage, education, health and care. Supplementary guidance specific to Linlithgow and relating to these topics will be issued before the end of 2016."</p> |
| 5.65           | ✓ | Agreed.   |
| 5.66           | C | The reference to "current limits" is confusing. Suggest either "the limits described in LDP 2009" or "the limits described in this proposed LDP".   |
| 5.67           | ✓ | Agreed.   |
| 5.95           | C | The feasibility study to identify a location for a new health and care centre should reflect the views of a recent survey of residents that the health and care facilities should be retained in the centre of town. The statement should say "a feasibility study to identify a location and funding programme for a new health and care centre in the centre of Linlithgow is proposed. There is a strong preference for retaining the health centre in its existing position expanding into the Council owned land to the rear (north) of the building".   |
| 5.110          | C | <i>An increase in the capacity of the road network in some key locations will also be required if both the housing and employment growth set out in the LDP are to be accommodated.</i> This must apply specifically to Linlithgow.   |
| 5.144<br>5.145 | C | While the principle of countryside belts is agreed and applauded this must be seen in the context of a logical settlement boundary which is based on the current developed area plus an expansion which takes account of landform rather than existing field boundaries and land ownership.   |
| 5.202          | C | The battlefield site of Linlithgow Bridge can be best protected by not being included within the settlement boundary.   |

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It is agreed that the basic approach of “build tight, ventilate right” design of houses is the correct approach and should be mandatory for all new council housing and recommended for private housing. However, the economic case for the incorporation of photovoltaic technologies has not yet been proven. Additionally, currently and probably for the next few years at least, the time taken for electricity generation to pay-back the embodied energy in manufacture, transportation and installation of PV approaches the life of the product. Therefore to have a policy for housing orientation to optimise on solar power appears ill conceived where this may only be achieved at the expense other design factors which can save considerably more energy. The policy should be re-written.

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| LINLITHGOW & LINLITHGOW BRIDGE |  |                |                               |
|--------------------------------|--|----------------|-------------------------------|
| Population in 2013             |  | 13,560         | (NRS 2013 Mid Year Estimates) |
| HOUSING                        |  |                |                               |
| LDP Site Ref                   | Location                                       | Site Size (Ha) | Capacity                      |
| H-LL 1                         | 81-87 High Street, (former Bus Depot)          | 0.3            | 41                            |
| H-LL 2                         | Westerlea Court, Friarsbrae                    | 0.3            | 12                            |
| H-LL 3                         | Boghall East                                   | 3.2            | 50                            |
| H-LL 4                         | Land east of Manse Road                        | 2.0            | 45                            |
| H-LL 5                         | Falkirk Road (land at BSW Timber)              | 0.7            | 18                            |
| H-LL 6                         | Mill Road, Linlithgow Bridge                   | 1.6            | 15                            |
| H-LL 7                         | Clarendon House, 30 Manse Road                 | 2.6            | 8                             |
| H-LL 10                        | Clarendon Farm                                 | 26.0           | 120                           |
| H-LL 11                        | Wilcoxholm Farm/Pilgrims Hill                  | 20.0           | 200                           |
| H-LL 12                        | Preston Farm                                   | 5.1            | 60                            |
| EMPLOYMENT                     |  |                |                               |
| LDP Site Ref                   | Location                                       | Site Size (Ha) | Use classes                   |
| E-LL 1                         | Mill Road Industrial Estate, Linlithgow Bridge | 1.31           | 4,5                           |
| E-LL 2                         | Land at Burghmuir, north of Blackness Road     | 9.6            | 4                             |

Comments:

1. H-LL1 largely completed
2. H-LL2 Planning permission given
3. H-LL3 Agreed
4. H-LL4, H-LL10 and H-LL11. These sites should be reflected in the LDP as a single East of Linlithgow development area. The boundary of the site should reflect landform. Roads serving these sites and also giving relief to current inadequate roads and bridges should be shown. Properly planned with planned infrastructure the capacity of this area could be in the region of 660 houses.
5. H-LL 10 It would be entirely inappropriate for the main access to this site (for

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|  | <p>which 119 houses are planned) to be via St. Michael's hospital access. The hospital access is narrow, winding, steep and controlled by traffic lights.</p> <p>5. H-LL5 Agreed</p> <p>6. H-LL6 this site has capacity for at least 30 houses.</p> <p>7. H-LL7 Agreed</p> <p>8, H-LL12 We do not agree that this is a good site for development. All the arguments made for the Burghmuir development apply to this site. It is a site of great landscape value and amenity. Any development will be dominant when viewed from afar. It is far from the town centre, existing shops and public transport.</p> |
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## LINLITHGOW INFRASTRUCTURE & TRANSPORT

✓ = Agreed C = caveat (agreed in principle but with reservations) X = Disagree for reasons stated

### Summary of Proposed Policy:

|               |   |   |
|---------------|---|---|
| <b>Vision</b> | ✓ | The area will enjoy better transport connectivity with more options for sustainable travel choices and more active travel routes.   |
| <b>Aim</b>    | ✓ | Ensure that all essential infrastructure and facilities are provided to support population and economic growth and where appropriate, secure proportional developer contributions to facilitate the delivery of such provision.   |
| <b>TRAN 1</b> | ✓ | <i>The council will co-operate with other agencies in preparing investment programmes to enhance the environment by active travel infrastructure, public transport facilities, traffic and parking management.</i>  |
| <b>TRAN 2</b> | ✓ | <i>Developers will provide or contribute towards, the provision of travel improvements including traffic and environmental management measures, measures to promote trips by sustainable modes including walking, cycling, public transport, car sharing, and road improvements where these would be justified as a result of new development or redevelopment.</i> |
| <b>TRAN 3</b> | ✓ | <i>The council will encourage and seek to develop an active travel network to promote sustainable travel.</i>   |
| <b>TRAN 4</b> | ✓ | Advertising.  |
| <b>TRAN 5</b> | X | Missing. A policy to investigate and mitigate congestion and pollution in town centres.   |

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| <b>5.66</b>    | <b>X</b> | This clause relates to development causing environmental harm to the town, principally, but not exclusively, by way of visual impact, traffic congestion or air quality. The clause should state that Linlithgow is currently being harmed by traffic congestion and poor air quality which should not be aggravated by new development. The current planned mitigation measures of traffic signalling at points on the network to reduce queueing and slip roads on the M9 will not address the fundamental problem - see below. |
| <b>5.113</b>   | ✓        | <i>Key developments for West Lothian include the continued safeguard of western slip roads at Junction 3 on the M9 at Linlithgow.</i>   |
| <b>5.241</b>   | <b>X</b> | <i>Air quality in central Linlithgow has been and continues to be a significant source of concern. The problems are principally associated with high volumes of stop/start traffic in the High Street, which in most cases has no alternative practical east– west route.</i><br><br>This clause should state that a study is proposed to investigate a new High St relief road to give an alternative east - west route.   |
| <b>Page 35</b> | <b>X</b> | Missing from the roads section on page 35 is the upgrading of the road from the Southern end of Manse Road to the roundabout at the junction of Main St, Dechmont and the A899, to connect Linlithgow to Livingston. This 7km road with new cycle path would demonstrate the Vision. At the very least the existing footpath via Beecraigs and Bangour Fisheries should be upgraded to a cycleway with the missing link between Bangour Fisheries and the A89 properly established.   |

### Review of Supplementary Guidance Transport appraisal and modelling August 2014 - Linlithgow

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| <b>SG</b> | <b>X</b> | The Transport Appraisal is a reactive assessment which considers the impact of development scenarios, mainly traffic generated by housing development. What is required is a proactive plan, proposing new transport infrastructure and management to solve existing problems as well as those generated by new development. The resolution of these existing and future problems to be financed by new development. This is illustrated in 'A Plan for the Future'.   |
| <b>SG</b> | <b>X</b> | The Transport Appraisal concludes that the development proposals included in the Local Development Plan can be accommodated by the implementation of various mitigating measures which fall broadly into two areas. The improvement to the traffic management of the major junctions on the High Street, Falkirk Road and Edinburgh Road and the provision of West orientated slip roads at the M9/ Blackness Road Junction 3 motorway interchange. Only the latter is included in the development plan. (5.113) |

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| <b>SG</b> | <b>X</b> | With the exception of the West Port junction, where new signal control is proposed, all the traffic management measures involve changes to the signal timings and junction layout and benefits to main road traffic are offset by increased delays to retail access at Linlithgow Bridge and for traffic exiting Preston Road.   |
| <b>SG</b> | <b>X</b> | <p>The Transport Appraisal:</p> <ul style="list-style-type: none"> <li>• Does not address public transport, pedestrian movements or cycle provision.</li> <li>• Sees the problem only in terms of potential new development and ignores other drivers for growth in traffic over the next 10 years.</li> <li>• Only addresses morning peak flows.</li> <li>• Does not address illegal parking the reason for which and the mitigation measures for which need further study.</li> <li>• Acknowledges that traffic feeding onto the town network is restricted by the Model to the capacity of the network which given the limited size of the network has an impact on the Model's viability.</li> <li>• Gives no consideration to the provision of additional parking or the impact that the associated traffic would have on the network.</li> </ul> |

## LINLITHGOW NATURAL/HISTORIC ENVIRONMENT

✓ = Agreed C = caveat (agreed in principle but with reservations) X = Disagree for reasons stated

### Summary of Proposed Policy:

|               |          |  |
|---------------|----------|--|
| <b>Vision</b> | ✓        | Development will take place in a way that is ..... sensitive to the area's many built and natural heritage assets.   |
| <b>Aim</b>    | ✓        | Protect and enhance the natural and built environment and it's cultural landscapes.  |
| <b>ENV 7</b>  | <b>C</b> | Countryside Belts and Settlement Setting - The principle of 'Countryside Belts' is supported, subject to fine-tuning of the areas of land concerned to reflect the eventual development pattern agreed, taking into account the Planning Forum's 'Plan for the Future'. The 'Plan for the Future' respects the currently designated 'Areas of Landscape Value' as they have been very effective in preventing unnecessary development on attractive parts of the town fringes. In this context the proposed release of the housing site at Deanburn Road, as contained in the draft LDP, is opposed. |
| <b>ENV 12</b> | <b>C</b> | Union Canal - The general statements made are supported but the lack of specific proposals to realise the canal's economic and environmental potential is an omission.   |

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| <b>ENV 25</b>    | <b>C</b> | Linlithgow Palace & Peel and High Street Rigs - there is no mention of encouraging appropriate restoration/re-roofing of all or part of Linlithgow Palace or indeed how such proposals would be viewed by the planning authority. It is also disappointing to note that there are no specific proposals to improve the quality of the public realm in Linlithgow High Street, whether with regard to paving, street furniture, air quality, traffic intrusion or parking. The presumption against development in the rigs is supported, provided that it does not jeopardise any developments proposed in the community 'Plan for the Future'. |
| <b>EMG 4</b>     | <b>C</b> | West Lothian's major air quality issues are in Broxburn and Linlithgow. These issues in Broxburn will be alleviated by means of new relief road construction, but there is no recognition that a similar approach could be adopted in Linlithgow. Indeed nothing is being proposed that would address the Linlithgow problem in practical terms. The siting of unsightly apparatus located immediately adjacent to a category 'A' listed building (St Michael's Well) is not appreciated by the Community.   |
| <b>Other ENV</b> | ✓        | All other Natural and Historic Environment policies are supported.   |
| <b>SEA</b>       | <b>X</b> | The update to the Strategic Environmental Assessment (Oct 15) considers additional sites only. There are some ramifications of the establishment of Historic Environment Scotland which should be considered by the LDP. Additionally, the size and content of the SEA document plus the unavailability of key maps until late in the consultation period has prevented proper study and therefore comment.  |

## LINLITHGOW ENVIRONMENT

✓ = Agreed C = caveat (agreed in principle but with reservations) X = Disagree for reasons stated

### Summary of Proposed Policy:

|               |          |   |
|---------------|----------|---|
| <b>Vision</b> | ✓        | Development will take place in a way that is sustainable, meeting the challenges of climate change and renewable energy.  |
| <b>Aim</b>    | ✓        | Help achieve climate change objectives by minimising the area's carbon footprint through promoting development in sustainable locations and supporting mitigation and adaptation measures.              |
| <b>NRG 2</b>  | <b>X</b> | <i>"All new residential, commercial and industrial buildings must have a minimum installed solar roof capacity".</i><br><br>This should not be promoted as a policy - see comments NRG 4 & 5.218 below. |

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| NRG 3         | ✓ | <p><i>“The council supports the development of wind energy schemes in principle”.</i></p> <p>Whilst we agree that precautionary principles are observed we would stress that we are opposed to wind turbines in areas currently designated “areas of great landscape value”.</p>  |
| NRG 4         | C | <p><i>“The council supports the development of renewable energy schemes in principle”.</i></p> <p>The precautionary principle should be observed such that passive design is encouraged and renewable energy technologies are proved. This statement contradicts NRG 2 which should be omitted.</p>   |
| NRG 5         | C | <p><i>“Development proposals for over 100 homes will be encouraged to consider the use of community energy networks in their development. Where an existing local energy network is established, developments will be expected to connect to the network, if feasible”.</i></p> <p>This seems like an aspiration rather than a policy.</p>  |
| 5.217         | C | <p><i>“One of the Scottish Government’s current aims is de-carbonisation of heat policy. For spatial heating reducing the demand to heat homes and buildings is a key way in which planning can contribute to reductions of energy for heating”.</i></p> <p>Reduction of the heating requirement in all buildings, <u>including the existing</u>, has to be a prime objective.</p>  |
| 5.218 & 5.219 | X | <p><i>“Solar energy technologies for water heating and photo-voltaic cells are advanced renewables industries. Spatial heating accounts for approximately half of all domestic energy usage”.</i></p> <p>These two sentences together are misleading. Solar water heating is a proven technology which is continually improving. However, the technology requires significant maintenance and is not wholly energy neutral. Consideration has to be given to frost protection, pumps, type of supplementary water heating, hot water storage, etc. Photo-voltaic roof panels are an advanced technology which has yet to be economically proven. They involve high installation cost and characteristically have high embodied energy. Energy storage is an issue unless grid connected. Spatial heating does account for half of all domestic energy usage but in a modern house, where structural heat loss is reduced compared to older houses, a primary heat loss occurs through ventilation hence the maxim “build tight ventilate right”. Care needs to be taken in recommending the use of new technologies. New technologies should not be made the subject of a planning requirement.</p> |

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| 5.229 | C | <p><i>“The council also wishes to promote the use of renewable energy schemes where it can be demonstrated that there will not be any negative social, economic, or environmental results from the scheme”.</i></p> <p>Take out the word “also” and turn this statement into a policy.</p> |
|-------|---|--|

This ends critique of the vision, aims and aspirations of the LDP. We are opposed to this section remaining in its current form. Inappropriate exclusion of Linlithgow such as *“Promote the M8 corridor as the ‘must have address’ for key industries”* is disheartening to those attempting to fill Linlithgow’s vacant industrial buildings and demonstrates a divided West Lothian.

The next section focuses on the document Linlithgow: A Plan for the Future which is a proactive approach to the analysis of Linlithgow’s strengths, problems, threats and opportunities together with a plan for action.

The Community Council has subscribed to and approved the document Linlithgow: A Plan for the Future. This document represents our opinion of what should be included in a plan for Linlithgow and Linlithgow Bridge. The document is enclosed with this letter as Appendix A and should be read in conjunction with our specific comments above as a commentary on the LDP. The provisions outlined in the document are the result of deliberations and a consensus between:

- Linlithgow & Linlithgow Bridge Community Council
- Linlithgow Civic Trust (including Burgh Beautiful Linlithgow)
- Linlithgow Business Association,
- Linlithgow Cycle Action Group
- Linlithgow Victoria Hall Trust.

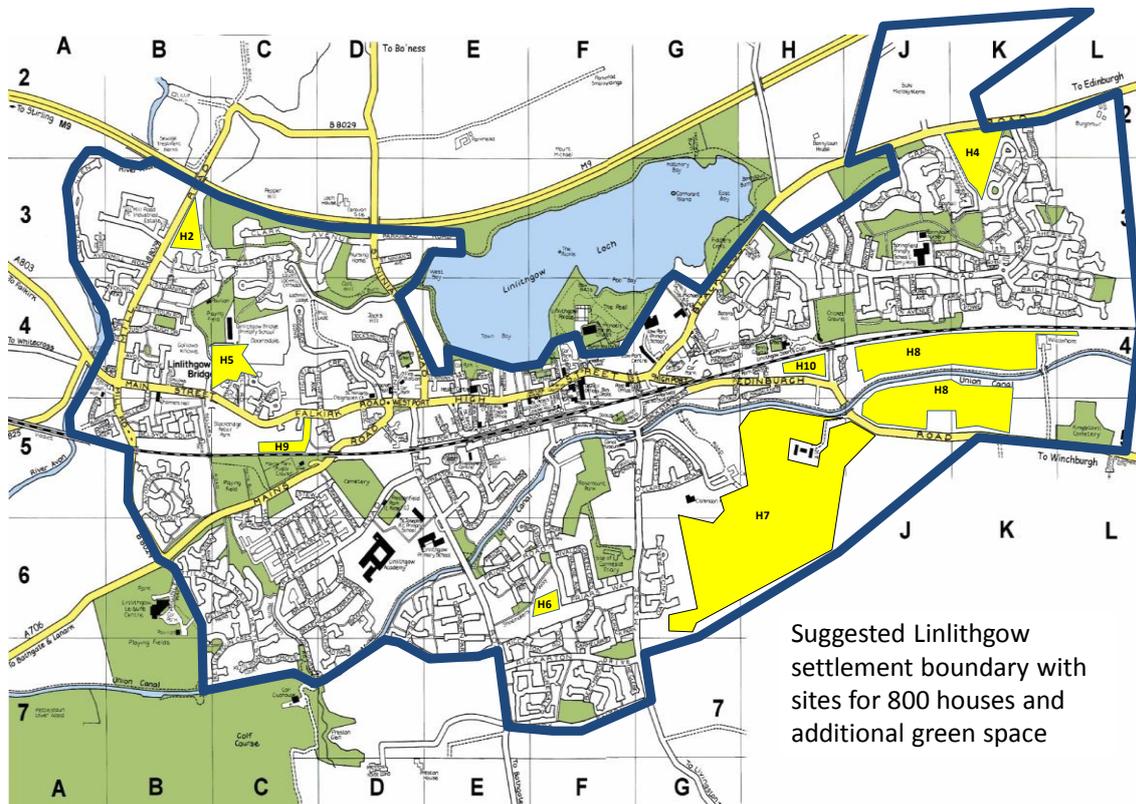
Other organisations such as Transition Linlithgow and the Linlithgow Community Development Trust have also been heavily involved although consensus was not reached on every point.

The provisions in the document were tested in a Public Exhibition held in Low Port Centre on Tuesday 17<sup>th</sup> November. 123 residents attended the exhibition and completed 73 detailed questionnaires. A large number of comments were recorded and these together with the questionnaire results are appended as Appendix B of this letter.

The primary conclusions from the Exhibition were:

- Agreement that the “area of restraint” designation should be removed.
- Agreement that past policies relating to Linlithgow; particularly the sale of council houses, the lack of infrastructure investment and an ad hoc approach to infill development, have contributed to the problems outlined and resolved in the Plan for the Future but not resolved in the LDP.
- Disappointment that the proposed LDP adopted a field by field development approach. The LDP approach is not acceptable; the town needs a proper masterplan for development over the next 15 to 20 years.

- Agreement to a defensible settlement boundary. The following diagram is indicative of a potential settlement boundary, following landform contours rather than existing fields and focusing on development in the south east quadrant in areas which are closest to the town centre, can be easily serviced by new distributor roads and are conducive to landscaping. The indicative settlement boundary does not take account of land ownership.



Proposed indicative settlement boundary

The questionnaires completed by exhibition attendees highlighted a high level of agreement on key Plan for the Future aspirations. The full questionnaire results are given in Appendix 2. Ignoring those who indicated they were undecided; 90% of respondents indicated overall agreement over the 44 questions, with 10% indicating disagreement. Even including those residents from the Clarendon Road area 75% of respondents agreed that the SE quadrant of Linlithgow was the correct area for development although some qualified their agreement by stating “no development without infrastructure improvement”.

With respect to the most important issues for Linlithgow, some of which are included in the LDP vision and the aims but ignored in the substantive detail, agreement levels (ignoring undecided) were as follows:

- |  |     |
|--|-----|
| • Dealing with loch and watercourse pollution (Prop ES7, page 17)    | 99% |
| • Measures to cut down High Street air pollution (Prop ES8, page 17) | 99% |
| • Enhancements to Linlithgow’s Conservation Areas (Prop B1, page 18) | 99% |
| • Tourist Information Centre at the Burgh Halls (Prop B4, page 20)   | 97% |
| • A business park at Burghmuir (Prop E2, page 23)                    | 78% |

- Social-rented and affordable housing (Prop H1 to H3, page 24) 93%
- Infill private housing development(Prop H4-6 pg 25 & Prop H9-10 pg 26) 92%
- Mixed housing in SE quadrant (Prop H7-8 on pgs 25-26) 75%
- Traffic management to 'reclaim' the High Street (Prop T1 page 28) 90%
- Four-way motorway interchange at Burghmuir (Prop T2A, page 29) 94%
- High St Relief Road, hidden to north of Linlithgow Loch (Prop T2B, p. 29) 80%
- Eastern Local Distributor Road (Prop T4, page 29) 83%
- Relief of traffic over canal bridge, Manse Road (Prop T5, page 30) 93%
- Decked car park behind Regent Centre (Prop T6, page 31) 85%
- Redevelopment of Guyancourt Vennel (Prop S2, page 34) 89%
- Construction of new primary school at Edinburgh Road (Prop ED1, pg 39) 87%
- Creation of integrated health centre on town centre site (Prop HE1 pg 40) 97%
- Support for Plan's proposals for funding/implementation (pages 41 & 44) 91%

In conclusion Linlithgow and Linlithgow Bridge Community Council is opposed to the LDP. Although the Vision and Aims of the LDP promises much it is clear that the attention of the Council is not on Linlithgow. Statements specifically excluding Linlithgow and references to the M8 corridor are disappointing. There is general agreement that the time is right for the town to expand and that future housing development should be in the South East quadrant. However, in the light of Linlithgow's current problems the Community Council will maintain opposition to any development in the absence of an explicit plan for infrastructure improvements including; roads, parking, drainage, education, health and care.

Yours faithfully

Dr John R Kelly  
 Planning Secretary

Encl: Appendix A Linlithgow: A Plan for the Future  
 Appendix B Comments made at an Exhibition 17<sup>th</sup> November 2015.