

## WEST Lothian Council – Planning, Economic Development &amp; Regeneration

## Consultation Summary

## Planning Guidance – The Vennel, Linlithgow

Consultee	Summary of comments	Proposed council responses)
(7)	<b>MEMBERS OF THE PUBLIC</b>	
John D Carswell	<p>Redevelopment – suggests demolishing as much as possible; mixed development; private developer with suitable architect; desirable for flats to west side of The Cross can be incorporated.</p> <p>Urban design - consider relationship with Palace, Church, Peace Garden, Victoria Halls, Cross House, The Cross, Partnership Building, Templars Court etc.</p> <p>Housing – mixed tenures suggested but notes conflict of social housing and making money; considers unsuitable area for families.</p> <p>Tourist Buses parking / setting down – long overdue; should not be at The Cross; use lower level to screen; provide toilets and shelter adjacent.</p> <p>Youth Centre – good to have town centre location.</p> <p>Car Parking / public transport – too much parking in the town; some parking may be required for church, Cross House, housing and tourists.</p> <p>Should mention public transport.</p>	<p>Support for mixed development is welcome. Flats to the west side are not wholly within council ownership and have not been declared surplus to requirements.</p> <p>Guidance includes urban design parameters; consultation with Historic Environment Scotland has been undertaken; no change to the Planning Guidance required.</p> <p>Housing is one of the proposed potential uses subject to education capacity being available; no change to guidance required.</p> <p>Beyond scope of the Planning Guidance.</p> <p>Linlithgow Young People’s Project (LYPP) is a tenant of WLC and may or may not need support for re-location at a later date; no change to the Planning Guidance required.</p> <p>Requirement for a parking assessment has been added to the Planning Guidance.</p> <p>Reference to public transport links has been added to the Planning Guidance.</p>

	<p>Traffic – excessive in the town, not to be encouraged by the development; remove as much as possible from The Cross area; no traffic in front of the Burgh Halls and if possible no exit from the development; consider mini-roundabout at Bryerton House to help access and traffic using High Street.</p> <p>Views of the Loch – improve views; can be enhanced by trees; several extant walls block possible views.</p> <p>Trees – keep as many as possible but do not let them hinder development and replant as required.</p> <p>High Street – do not reduce or undermine the role of the High Street.</p> <p>Grass / greenspace – have green areas along Loch for public use; picnic tables useful; discourage dogs and swans fouling paths and grass etc.</p> <p>The Loch – enhance as much as possible and do not build beside it e.g. café.</p> <p>Litter – always bad after a fine evening: improve the bins and their collection.</p>	<p>Beyond the scope of the guidance; some impact is anticipated but is not considered to be significant.</p> <p>Reference to a visual impact assessment has been added to the Planning Guidance.</p> <p>A tree conditions survey and detailed landscape plans are required by Planning Guidance.</p> <p>Beyond the scope of the Planning Guidance.</p> <p>Path around the loch is a Right of Way and core path; there are picnic sites elsewhere by the loch; animal fouling restrictions; area beyond the scope of the Planning Guidance.</p> <p>Planning Guidance has provisions for protection of the loch; views on loch-side development in consultation response are contradictory and inconclusive; no change to Planning Guidance required.</p> <p>Beyond the scope of the Planning Guidance, however urban improvements usually lead to greater respect of the environment.</p>
<p>Ian Fowell</p>	<p>Views / access to Loch - should also emphasise that there is scope to 'open up' the area at the back of The Vennel (near the public toilets) to give visual and pedestrian access to the woodland beyond.</p> <p>Parking - no loss of public car parking is welcomed as the existing Vennel car park is crucial in giving visitors and local access to town centre. However, the car park also serves the adjacent Church Hall and the Burgh Halls, both of which hold large scale public</p>	<p>No change to Planning Guidance required as it includes the following urban design aims which would improve visibility of trees nearer the loch:</p> <ul style="list-style-type: none"> <li>▪ <i>improved access between The Cross, High Street and loch</i></li> <li>▪ <i>protection of and enablement of views in, out and across the site</i></li> </ul> <p>Support noted. Concern over parking requirements is understood, however analysis of how a future development would impact parking usage is not</p>

	<p>events and functions, as well as providing parking for visitors to St Michael's Church and the Palace. Guidelines should refer to these requirements which means parking should be retained at eastern side of the site and not anywhere on site as suggested in draft guidelines.</p> <p>Tour bus parking - there is presently a significant difficulty with tour bus access to the Cross, Burgh Halls and Palace; the need for a safe and purpose-designed bus drop-off point should be included in the guidelines.</p> <p>Access to St Michael's Church Hall and Manse - is presently across part of the site, and should be maintained.</p> <p>Archaeology - the area would have been extensively redeveloped in the 1960s, but consideration should still be given to the possible need for archaeological excavations during development.</p> <p>Clarification - does not understand reference to pinch point caused by rail embankment, and think it should be sufficient to simply indicate there are no parallel rear streets in this part of the town centre.</p> <p>Mapping - there is no longer a surgery or clinic in The Vennel as marked on the site plan.</p>	<p>possible to assess in advance given the open nature of the brief, the unknown type of uses and configuration of future development. It is standard practice for planning applications to be reviewed by the Council's Roads and Transportation service.</p> <p>Outwith the scope of the Planning Guidance and site area.</p> <p>Requirement for a parking assessment has been added to the Planning Guidelines.</p> <p>Reference to archaeological assessment has been added to the Planning Guidelines.</p> <p>Traffic is constrained in central Linlithgow by geography and historic townscape pattern.</p> <p>Noted.</p>
<p>Kirsty Leonard</p>	<p>Opportunity for redevelopment of this town centre area is welcome and overdue; the Planning Guidance contains many relevant ideas and suggestions for this opportunity WLC capitalising on value of site high quality design difficult to realise.</p> <p>Flats /shops at The Cross – suggest refurbishing and notes not included in the Guidance; but probably reflects the view of many residents and because they are partly owner occupied and council tenants it may be impossible to knock them down and start again.</p> <p>Design for new residential buildings – care needed here to avoid the mistake of the past in which modern idiom became quickly outdated and despised; prefer pastiche of Poundbury approach in southwest England.</p> <p>Vehicular circulation, access and parking / usage of the site area by the local community and increasingly wider visitor interest - an innovative approach to the problems of a</p>	<p>Support for redevelopment and Planning Guidance noted; Planning Guidance is not statutory but is a planning tool to encourage better design and engagement with the planning process.</p> <p>Points noted; The Vennel multi-story blocks are outwith the site area; no change to guidance required.</p> <p>Planning Guidance has additional and sufficient urban design requirements; no change to the Planning Guidance is required.</p>

	<p>modern town, tourist and retail destination would be welcome; consider a new roundabout by including part of the wide pedestrian space presently occupied by a flower bed, whitebeam and silver birch trees between the Vennel passageway and the shops to the west</p> <p>Garden beds - important to retain or move the flower bed as it is the only Town Centre bed that can be used for feature floral designs.</p> <p>“Pedestrian access and circulation routes” – yes.</p> <p>“Barrier free disabled &amp; multi-user access through improved levels and integration” etc. – yes.</p> <p>No loss of parking provision underlined and supported.</p> <p>Provision for tourist coaches is badly needed.</p> <p>Landscape / Greenspace / Open Space - the Scots pines in the Vennel gardens are probably past their best and should go; the Norway Maple in the centre of the green space should be retained if possible; other trees on the loch-side, planted 50 years ago, appear to be mostly in good condition, lime, larch, alder, willow, although the sycamores have little to recommend them.</p> <p>Lochside area, including the part outlined in the Planning Guidance map - should not be built on but remain as a public park amenity with better access.</p> <p>Northeast bank to carpark - could be improved.</p> <p>No buildings, residential or retail – underlined because there are plenty of cafes in the area and the litter problem would be exacerbated.</p> <p>Concern that developers tempted to build luxury flats / hotel for the wealthy on land that is well used by both residents and visitors.</p>	<p>Planning Guidance includes rigorous design requirements; roundabout proposal outwith site area; no change to guidance required.</p> <p>Lanscaping will be a requirement of any re-development of the site. A landscaping scheme will be required as part of any planning application for the re-development of the site.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Beyond scope of the Planning Guidance.</p> <p>Requirements for a tree survey and detailed landscape plans have been added to the Planning Guidance.</p> <p>Lochside area is outwith the area covered by the Planning Guidance.</p> <p>Presume this is the unkempt, overgrown bank below lower carpark and is included in the area covered by the Planning Guidance.</p> <p>It is for developers to determine best usage of the site with respect to market conditions; litter management is beyond scope of Planning Guidance.</p>
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	<p>Iron artwork on the side of the Library – believe there is another panel of the nativity scene stored in a basement somewhere that was never hung, possibly due to weight issue.</p>	<p>The Planning Guidance sets out matters interested parties will be required to take into account in any proposals for the area. The Planning Guidance includes reference to artwork.</p>
<p>Nicholas Leonard</p>	<p>Redevelopment should be carried out by a private developer or a consortium in partnership with the Council, which should have a profit-sharing agreement to enable it to share in any financial gains which may arise but which would not expose it to any loss.</p> <p>All of the existing Vennel buildings together, if possible, with those at the west side of the Cross should be demolished and replaced by housing, together with cafes and shops to replace the existing ones.</p> <p>The design and construction materials of the new buildings should blend in unobtrusively with the existing high street.</p> <p>All existing green spaces should be preserved and, where possible, enhanced, with full access for the general public.</p> <p>More parking for cars and coaches should be provided.</p> <p>To ensure the widest possible acceptability of the redevelopment, suggest that prior to final legally binding approval of the plans, there should be a consultative, non-binding referendum in Linlithgow to obtain the endorsement of a majority of the residents of the Burgh.</p>	<p>The Planning Guidance will assist in any marketing of the site; considerable public investment made recently in central Linlithgow for renovation of County Buildings and Burgh Halls.</p> <p>Area is beyond the site boundary of the Planning Guidance. No amendments to the Planning Guidance are required.</p> <p>Reference to Historic Environment Scotland’s guidance: <i>New Design in Historic Settings</i> (2010) has been added to the Planning Guidance.</p> <p>The Planning Guidance requires a detailed landscape plan: improved access is an urban design aim. No change to the Planning Guidance is required.</p> <p>Coach parking is beyond the scope of the Planning Guidance; parking is assessed at application stage; a parking assessment is referred to in the Planning Guidance.</p> <p>Any proposals forthcoming would be subject to further consideration as part of the planning application process as proscribed by regulations.</p>
<p>Colin Sumpter</p>	<p>Pleased to see council is proposing redevelopment of area.</p> <p>More green space to the greatest extent possible.</p>	<p>Support welcomed.</p> <p>Landscape, greenspace and open space requirements are covered by the Planning Guidance. No change to the guidance is required.</p>

	<p>Advocate opening up an aspect from the High Street to the loch...that this could be achieved by a green corridor running through the existing library site down to the waterfront. Would support a café on the waterfront if this fitted with the HES requirements.</p> <p>Ask that the phrase 'it is accepted that there will be tree loss' be removed from the document and replaced with a statement that there will be a net increase in trees in the area....understand some mature trees will need to be removed, but it is not clear that these will be replaced.</p> <p>Solar energy generation / energy efficiency improvements for social housing at the Vennel flats</p> <p>Should be a requirement that development be as carbon neutral as possible.</p> <p>Reduction in car parking / car access – should be removed from centre of town and used as green space with sensitively designed commercial and leisure activities, because short distance from well-linked train station; there should be no need for regular vehicular access to palace, around well and on redeveloped site.</p> <p>Strongly supports proposed barrier free pedestrian access across the site.</p> <p>Does not support improved vehicular access.</p>	<p>Improved access to the loch is promoted by the guidance. A requirement for a Visual Impact Assessment has been added to the guidance. A café would fall under the acceptable uses however there are mixed views about proximity to the loch; the loch area no longer forms part of the Planning Guidance.</p> <p>Trees were built into to the design of the car park therefore not feasible to redevelop without damage / loss; a tree survey is required along with a detailed landscape plan; reference to this has been added to the Planning Guidance.</p> <p>The Vennel flats are outwith the site area.</p> <p>Reference to this is included in the Planning Guidance: Scottish Government's principle policies of sustainability consideration; cycle facilities and Electric Vehicle charging point requirements have been added to the Planning Guidance.</p> <p>Conflicting views on car parking received; assessment will be required of any parking proposals by the council's transportation team; a parking assessment will be required and reference to this has been added to the Planning Guidance.</p> <p>Support noted.</p> <p>Clarifying access arrangements is one of the prime reasons for producing planning guidance; proposals will be reviewed for satisfactory access and transportation arrangements by specialist council officers; reference to a parking assessment has been added to the Planning Guidance.</p>
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	<p>Parking provision - strongly plead with the Council to remove the requirement to re-provide parking spaces on a 1:1 basis as is suggested in the document; any multiple storey carparks should go down rather than up to save views from the High Street and be made as dense (and expensive) as possible; more spaces will just produce more drivers.</p> <p>Desirable if redevelopment could coincide with decision on an alternative east – west transport route around the north side of the loch, or to the south of the high street.</p> <p>Air quality – with respect to draft AQMA planning guidance, cars are the primary cause of air pollution harming our health in Linlithgow; main wish for the redevelopment of site is that it puts rail passengers, pedestrians and cyclists first, and cars should be actively discouraged by design.</p> <p>Would like confirmation that the draft AQMA planning guidance will be followed; that redevelopment will be <i>required to provide full air quality assessment. in particular:</i></p> <p>Public access and public ownership - keen that as much of the land as is possible stays in Council hands, stays free to access for all residents, is free from as many restrictions on use as feasible and that its care be integrated into the community; a space for people and looked after by the people, not sold to private developers or restricted to residents of any housing development.; because this is a trend that has been seen in other towns; a statement to this effect and commitment to a plan for how residents will be involved in how the site is managed would be good to see in this document.</p>	<p>Parking will be assessed at the planning application stage in accordance with proposed usage and regulatory framework; reference to a parking assessment has been added to the Planning Guidance.</p> <p>Beyond the scope of the Planning Guidance.</p> <p>Sustainability principles are a consideration in the Planning Guidance; text added in support of public transport usage, cycle facilities and EV charging.</p> <p>Air quality impacts are assessed at planning application stage against relevant guidance; reference to council policy on these matters has been added to the Planning Guidance.</p> <p>The Planning Guidance will assist in marketing of the site now that Linlithgow Partnership Centre has been opened; access, circulation and urban design requirements are included in the Planning Guidance; there will be an increase in public access at the partnership centre nearby; no change to the Planning Guidance is required.</p>
<p>John Watson</p>	<p>The town desperately needs enhanced medical facilities and coupled with adequate car parking, sensitively designed; this central area would be ideal for such a facility.</p> <p>Car parking - the town has a serious shortage.</p>	<p>Reference has been added to identify that a medical centre could be acceptable in any redevelopment of the site.</p> <p>Conflicting views received from respondents on car parking; parking requirements of proposals to be assessed; the Planning Guidance includes reference to a requirement for a parking assessment.</p>

	<p>More drastic action has to be taken against those individuals parking illegally, and causing unnecessary congestion on the High Street.</p>	<p>Illegal parking is a police matter; no change to the Planning Guidance required.</p>
<p>Mike Vickers</p>	<p>Council asked to withdraw the proposed guidance for the development at The Vennel.</p> <p>Agree with point that the Vennel is central to the wellbeing of Linlithgow as a thriving community now and in the future.</p> <p>Any development needs to be carefully designed from 'The top down' but guidance makes no attempt to consider what is appropriate other than state the obvious; a mixed development covering any of residential, parking, commercial / retail, tourism facilities, small workshops, outdoor space.</p> <p>Presume it is expected that developer/s will come forward with a proposal: this is unacceptable; planning department must take the initiative bearing in mind The Vennel's central position, limited space, the Palace and the Peel, educational and access constraints etc. Propose that guidance for the development is withdrawn and that the council undertakes some real town planning of the Vennel area.</p> <p>Site - suggest consideration of extending the site to include the Vennel flats on the High Street to the east of proposed site.</p> <p>The town should undertake a controlled charrette.</p>	<p>Development and Transport PDSP agreed to take the site forward to consultation stage on 3/05/17; the Planning Guidance will assist in any future marketing of the site.</p> <p>Noted.</p> <p>Planning Guidance is not a statutory requirement and the council has produced guidance with enhanced urban design and historic sections given the sensitivity of this town centre site; no change to the Planning Guidance is required.</p> <p>Planning Guidance is an early stage in the development process; any proposal will ultimately be handled and determined by the council as local planning authority; no change to the Planning Guidance is required.</p> <p>The Vennel flats are beyond the scope of the Planning Guidance due to site arising from the conversion of County Buildings and the consequent relocation of many of the uses which are in the site area and the mix of private and public ownership within the multi-story blocks renders their redevelopment problematic. There are also many long-term residents for which the Vennel flats are their homes. No amendment to the Planning Guidance is required.</p> <p>Pre-applications consultation (PAC) is more appropriate in this case given that site is for private sale; no change to Planning Guidance is required.</p>

	<p>Ownership - rejects the implication that the site should be sold to the developer / developers; the ground is so central to the beauty and wellbeing of Linlithgow it must remain in public ownership; there must be no selling of the family silver to cover short term money difficulties.</p>	<p>The Vennel area has only been in public ownership since the original redevelopment of this former, partly industrial area. The site has become surplus as a result of investment in other public buildings in the town. No change to Planning Guidance is required.</p>
<b>(6)</b>	<b>COMMUNITY GROUPS</b>	
<p>Linlithgow Civic Trust (LCT)</p>	<p>It is suggested that West Lothian Council has carried out a 'very basic method of consultation' for the draft planning guidance.</p> <p>The Civic Trust has worked with the other member organisations of the Linlithgow Planning Forum (Linlithgow &amp; Linlithgow Bridge Community Council, Transition Linlithgow, the Linlithgow Business Association, the Linlithgow Victoria Hall Trust and the Linlithgow Community Development Trust) to undertake a more detailed and informative public consultation exercise than would have been possible in direct response to the development ideas (set out in the response's Appendix One: Suggested Draft Layouts from Vennel Exhibition) were submitted 'as draft ideas to which the public could respond more easily than in relation to the Council's general Planning Guidance document'.</p> <p>The LCT summarises conclusions on the public response to the proposals from the Linlithgow Planning Forum (Appendix 2: Vennel Redevelopment Exhibition - Summaries of Questionnaire Results), in the following points...</p> <p>Many Linlithgow people acknowledge that this is a once in several life times' opportunity to substantially improve the centre of Linlithgow.</p> <p>Linlithgow Civic Trust believes that the current draft planning guidance is insufficient to seek development proposals which will answer the requirements of the Linlithgow Community In both the initial survey and the final questionnaire; over 80% of respondents wished to see the Linlithgow community actively represented at all stages of the</p>	<p>The council has carried out the standard approach to planning guidance preparation including a large mail-out to neighbour properties and press releases; there is no statutory requirement to produce planning guidance and in this case additional detail on urban design and the historic environment have been added; no change to Planning Guidance is required</p> <p>The Linlithgow Planning Forum was advised that the consultation on the planning guidance for The Vennel site was limited to the terms of that guidance. Hence much of the detailed submission does not relate to the consultation on the draft Planning Guidance for the Vennel site.</p> <p>The summary in point form of the conclusions of the Linlithgow Planning Forum is welcome.</p> <p>Point noted.</p> <p>There will be a further opportunity for input into the process at pre-application consultation (PAC) stage and at later stages in the planning process.</p>

	<p>development of the project brief. Representatives of the Community Council, the Linlithgow Civic Trust, the Linlithgow Business Association, Transition Linlithgow and Linlithgow Community Development Trust and 41 residents of Linlithgow have stated that they would like to be involved in all stages of the formulation of the Vennel redevelopment project.</p> <p>There is 94% support for the redevelopment of the parts of the Vennel site identified by the Council for redevelopment (as a minimum).</p> <p>There is 90% support to extend the redevelopment area as far as the west side of The Cross.</p> <p>Housing - 81% support at least a quarter of the houses in any redevelopment scheme being social-rented and 91% would like to see housing for younger people such as first-time buyers. Room sizes larger than the minimum standard are supported by 82%.</p> <p>83% want more car parking than at present.</p> <p>92% want public toilets included in the scheme.</p> <p>88% would like existing shopkeepers to be given new shop units on site.</p> <p>Youth facilities - 76% want to see youth facilities to continue to be catered for.</p>	<p>Support noted.</p> <p>The Vennel flats are beyond the scope of the Planning Guidance due to the site arising from the conversion of County Buildings and the consequent relocation of many of the uses which are in the site area; the mix of private and public ownership within the multi-story blocks renders their redevelopment problematic. There are also many long-term residents for which the Vennel flats are their homes. No amendments to Planning Guidance required.</p> <p>Residential usage is one of the potential uses given in the Planning Guidance; room sizes are a matter for Building Standards; no amendments to Planning Guidance required.</p> <p>There are conflicting views on parking levels; car parking will be assessed for proposals forthcoming; reference to requirements for a parking assessment have been added to the Planning Guidance.</p> <p>Public toilets are now available nearby at the Linlithgow Partnership Centre and the Burgh Halls; no amendments to Planning Guidance required.</p> <p>Retail is a potential use in the Planning Guidance; the Vennel blocks are beyond the scope of the Planning Guidance.</p> <p>Linlithgow Young People's Project (LYPP) is a tenant of WLC and may need support for re-location at a later</p>
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	<p>Design - 95% wish to see a design in sympathy with Linlithgow's traditional buildings in terms of built form and building materials.</p> <p>Connectivity &amp; Views - there is similar support for new / attractive links between the High Street and the loch, making the area more attractive to tourists, upgrading the quality of existing open space and preserving important views to the tower/spire of St Michael's Parish Church and the tower of the Burgh Halls</p> <p>Vennel flats - 78% want to see some of the existing central open space allocated more clearly for Vennel residents.</p> <p>Design - With regard to the draft development ideas 89% indicated their support (i.e. Linlithgow Planning Forum: Map 1 – Possible Townscape &amp; Landscape Framework, Map 2 – Possible Layout &amp; Content of Development; Map 3 – Possible Phasing of Development).</p> <p>Consultation and engagement - 97% thought that the Linlithgow Planning Forum should be involved in the formulation of a detailed Development Brief for the site.</p> <p>Potential usage - there was lesser, but still substantial support for: housing for the elderly (60%), a small hotel/restaurant overlooking Linlithgow Loch (67%), shop units for specialist/tourist-related businesses (62%) and a 'business centre' or similar (61%).</p>	<p>date; WLC Estates to address in due course; no change to Planning Guidance required.</p> <p>Design, open space and urban design parameters are provided in the Planning Guidance.</p> <p>Agreed that important views should be assessed and protected through visual impact assessment; reference to visual impact assessment has been added to the Planning Guidance.</p> <p>Provision of external grounds for Vennel residents is beyond the scope of the Planning Guidance.</p> <p>Premature for detailed design at planning guidance stage; no change to Planning Guidance.</p> <p>The usual practice is for planning guidelines to be sent to the local community council, local groups and publicised in the media; planning guidance is not a statutory requirement</p> <p>All of these suggestions are contained within the proposed uses are set out in the Planning Guidance.</p>
<p>Linlithgow Community Development Trust (LCDT)</p>	<p>Urban design - The LCDT supports the aim of the document "to seek a comprehensive urban design offering a contemporary redevelopment of the site befitting its historic and town centre location."</p> <p>For proposed uses we support a mixed use development.</p> <p>Community space - We would welcome the inclusion of 'Community Space, rather than just 'Community events and outdoor space'. The need for some form of community space has been raised by a number of groups during this consultation period.</p>	<p>Support for urban design approach noted.</p> <p>The guidance supports the possibility of mixed use development.</p> <p>Linlithgow is well served by buildings in the town offering potential community space, and, now with the addition of the renovated Linlithgow Partner Centre.</p>

	<p>Air quality - guidance must highlight current designation Air Quality Management Area. Vehicular circulation access and Parking, and Pedestrian access and circulation routes, which are mentioned in the guidance, will be impacted by the measures being discussed to address air quality problems on the High Street. Vennel Development must complement forthcoming Air Quality Action Plan.</p> <p>Urban design - we support the key urban design aims. We are pleased the guidance mentions the importance of 'place making'.</p> <p>Engagement - design proposals ought to demonstrate how the community will be involved in developing the design.</p> <p>Town centre renewal - this development offers a perfect opportunity for Linlithgow to make use of the Scotland's Towns Partnership Town Centre Toolkit, which helps the local authority, wider public sector, businesses and the community identify what is required to make their town centre more attractive, active and accessible. Given the pivotal central location of the site in Linlithgow's town centre this, or a similar, exercise should be a requirement of the development guidance.</p> <p>Private and community development approach - Linlithgow Community Development Trust is open to discuss ideas with interested developers, and we are aware of other community groups who have noted interest in being involved. Exploring a private and community development approach may help to secure wider investment for this crucial but complex and sensitive site. It would be helpful to outline this within the guidance to encourage potential developers to make early contact with community groups to discuss possibilities.</p>	<p>Proposals would be assessed at planning application stage for potential air quality impacts; reference has been added to the Planning Guidance for the need to comply with council policy in relation to air quality.</p> <p>Support for urban design aims noted.</p> <p>A further opportunity for input will be at pre-application consultation (PAC) stage and later when a planning application is forthcoming; reference to PAC has been added to the Planning Guidance.</p> <p>Town centre wide renewal is beyond the scope of the Planning Guidance.</p> <p>As before, further opportunities for involvement will be at pre-application consultation (PAC) stage and through the planning process.</p>
<p>Linlithgow and Linlithgow Bridge Community Council (LLBCC)</p>	<p>(Based on cover letter / consultation response to draft planning guidance)</p> <p>Many Linlithgow people acknowledge that this is a once in several lifetimes' opportunity to substantially impact the centre of Linlithgow</p> <p>We believe that the current draft Planning Guidance is insufficient to seek development proposals which will answer the requirements of the Linlithgow community.</p>	<p>Point noted.</p> <p>There is no requirement for the council to produce planning guidance; therefore robust and succinct guidance is an added benefit and will assist in any future marketing of the site.</p>

	<p>Engagement - In both the survey and the questionnaire over 80% of respondents wished to see the Linlithgow community actively represented at all stages of the compilation of the development brief. Policy HER 18 states “The Council will work with communities on the formulation and promotion of community led enhancement schemes where appropriate to the character of the area”</p> <p>Our response to the Draft Planning Guidance is as follows:                  Design/ heritage - The majority answering either the survey (70%) or the questionnaire (95%) wish to see a design in sympathy with Linlithgow’s traditional building in terms of built form and building materials.</p> <p>Landscape - 70% of survey respondents wished to see more open space and gardens, 81% of questionnaire respondents wished to see an upgrade in the area through soft landscaping.</p> <p>Vennel garden area - a primary concern of the residents of the north and west blocks of Vennel flats is the loss of the existing garden area to the south of the north block. We suggest that the garden be excluded from the development area on the plan.</p> <p>Vennel parking - we also suggest that an area of residents only parking be included south of the north block.</p> <p>Tourism - In the survey only 3% of respondents would not wish to encourage more tourists and 97% of those expressing an opinion in the questionnaire wanted this area of the town to be more attractive to tourists. Therefore facilitating more tourists is a prime requirement. 64% of respondents to the survey wish to see a visitors centre with public toilets as a part of the Vennel redevelopment.</p> <p>Slightly less than half of respondents (46% survey and 47% questionnaire) would like to see a loch side hotel.</p> <p>Traffic, parking - parking of cars and tourist buses and traffic on the High St generally is a study in its own right and should be carried out in the context of Linlithgow as a whole.</p>	<p>There will be a further opportunity for input into the process at pre-application consultation (PAC) stage and at later stages in the planning process</p> <p>Robust urban design and heritage guidance has been provided which is to be supported by a further documentation on townscape and historic environment; reference to submission of a Heritage Statement has been added to the Planning Guidance.</p> <p>A detailed landscape plan is a requirement of the Planning Guidance and reference to this has been included in the Planning Guidance.</p> <p>The site is not within the area covered by the guidance.</p> <p>Dedicated parking for the Vennel flats is to the west of the barrier adjacent the west block; reference to a requirement for a parking assessment has been added to the Planning Guidance.</p> <p>Tourism facilities are identified as a potential use in the Planning Guidance; public toilets and visitors facilities are relocated to the Linlithgow Partnership Centre (Tam Dalyell House).</p> <p>Tourism facilities are identified as a potential use in the Planning Guidance.</p> <p>Urban traffic analysis is beyond the scope of the Planning Guidance; a requirement for a parking assessment has been added to the Planning Guidance.</p>
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	<p>Retail - although there was some concern at increasing the retail offering, (31% of survey respondents did not want more shops) there was a majority view (59% survey, 62% questionnaire) that small shops to attract specialist and / or tourist related retailers would be desirable.</p> <p>Housing - the majority of survey respondents (55%) supported more housing as a part of the project with a strong following (questionnaire 66%) for 25% of housing being social rented.</p> <p>Business centre - 43% (survey) and 40% (questionnaire) would like to see a business centre with facilities for start-ups, rentable desks and meeting rooms particularly for micro businesses and home workers. There are a high proportion of micro businesses and home workers in Linlithgow, a group which is currently unsupported in terms of central facilities.</p> <p>Community facilities - 59% of survey respondents wished to see flexible space for daytime clubs and evening youth activities and 30% liked the idea of a rentable quality function room for family and other events.</p> <p>Youth centre – Linlithgow Young People’s Project, which currently occupies space in the Vennel, is highly regarded in Linlithgow as providing an invaluable service. There was mixed opinion regarding whether LYPP should occupy space at the Vennel or have a dedicated facility on the Low Port Centre site. What was not in doubt was that, as presently, LYPP need a town centre location near to bus services.</p> <p>Views - the draft PG states “new development will require to be stepped, of one and two storeys in height to protect important views of the palace, church and loch and their settings”. In reality, because of topography and trees within the peel the Palace cannot be seen from the High St even if there were no Vennel buildings. The spire of St Michael’s Parish Church and the tower of the Burgh Halls can only be glimpsed from certain angles given the current buildings outwith the proposed redevelopment area. 95% of questionnaire respondents wished current views to be retained but it would be perfectly practical to build to up to four storeys and not compromise these views, It is suggested that existing views of St Michaels spire be protected but not specify building height.</p> <p>Education - the design guidance states that housing should be restricted to retirement accommodation or one-bedroom flats on the basis of a temporary constraint on</p>	<p>Commercial / retail is indicated as a potential use in the Planning Guidance and cannot be discounted as it is within the Town Centre Boundary; support noted.</p> <p>Housing is indicated as a potential use in the Planning Guidance.</p> <p>Employment is a potential use in the Planning Guidance; a business hub has recently been initiated near the station.</p> <p>Linlithgow has considerable provision for community facilities including new provision at the Linlithgow Partnership Centre (Tam Dalyell House).</p> <p>This is a matter for WLC estates to address and outwith the scope of the Planning Guidance.</p> <p>Views are better in winter when the leaves are off the trees and from the west area of the high street looking across the Vennel site towards the church; the Vennel shopping parade were designed as low-rise to protect views; reference to a Visual Impact Assessment has been added to the Planning Guidance.</p> <p>New supplementary guidance setting out education requirements has been prepared by the council; new</p>
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	<p>educational places. This constraint will be largely resolved once Winchburgh Academy is completed and therefore it seems illogical to restrict the type of accommodation based upon a temporary constraint.                  Elderly housing - only 19% of respondents to the survey (42% answering a slightly different question in the questionnaire) saw further apartments for the elderly as being a desirable requirement.</p> <p>Sustainability - in respect of policy NRG 1 referred to in the draft Planning Guidance we would wish to see a more proactive statement regarding renewable energy generation projects, such as a solar energy cooperative, heat recovery or heat/cooling from the Loch.</p> <p>Loch - The water quality at Linlithgow Loch must not suffer at any stage of the development.</p> <p>Cross flats - there is a majority view in the survey (82%) and the questionnaire (90%) that the Cross flats should be included in the development for aesthetic and one important social reason. The Cross flats are in a deteriorating condition and many residents complain of being cold through leaking windows and suboptimal insulation. The Cross flats building will fail at some point in the future. Whether this point is reached in 5, 10 or even 15 years is immaterial in the context of the proposed project. This project gives the opportunity for residents to be permanently rehoused in the new flats on the Vennel site prior to the demolition of the Cross flats. If this decision is delayed and the new flats on the Vennel site are all occupied then, on inevitable future demolition, the existing community of residents will be split up and rehoused, possibly all over West Lothian. Businesses would also need to be temporarily or permanently accommodated in new premises as part of a phased construction programme.</p> <p>Other projects - a significant proportion of Linlithgow people view the Vennel redevelopment project as requiring the planned inclusion of other potential projects as well as the area depicted in the draft Planning Guidance namely; the double deck car park at the Regent Centre, the Victoria Hall, and the flats adjacent to the Cross (the Cross flats).</p> <p>The LLBCC Submission also includes:                  Online survey and paper based survey at Linlithgow Library; summary of Results of a Questionnaire recorded at the Exhibition for the Redevelopment of the Vennel 29th</p>	<p>high school provision is to be provided at Winchburgh; any educational constraints will be addressed at the time of any application for residential development. Any housing applications would be assessed on their merits.</p> <p>Sustainability principles are indicated in the Planning Guidance. It is premature to constrain future proposals which will have above average energy efficiency due to rising Building Standard requirements. Electronic vehicle charging and cycling requirements have been added to the Planning Guidance.</p> <p>SEPA is a key consultee to the draft guidance and for any proposals forthcoming.</p> <p>The Vennel flats are not appropriate to be included in the site area for the planning guidance; no change to Planning Guidance.</p> <p>These other properties are outwith the site area and beyond the scope of the Planning Guidance and site boundary.</p> <p>Detailed design suggestions are premature at this stage of the development / planning process and leaders of the community council were advised of this in advance; these items are beyond the scope of this</p>
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	<p>August 2017 at Low Port Centre; comments received online, from the door to door survey of Vennel residents and written comments received at the library; comments recorded at the exhibition for the redevelopment of the Vennel 29th August 2017 at Low Port Centre Linlithgow; Map - Possible Townscape &amp; Landscape Framework;; Map – Possible Layout and Content of Development; Map – Possible Phasing of Development.</p>	<p>consultation summary and have not been reviewed; no change to Planning Guidance required.</p>
<p>Linlithgow Reed Band (LRB)</p>	<p>Seek community space in which to hold rehearsals because do not have a regular space; parking would be crucial for such a facility for the reed band.</p> <p>Some central parking is vital for local businesses and those with restricted mobility.</p>	<p>The Linlithgow Partnership Centre will offer community space; there are also many other buildings in Linlithgow which offer potential space; no change to Planning Guidance.</p> <p>Any proposal would be assessed by the council's Roads and Transportation Service as is standard practice; reference to a parking assessment has been added to the Planning Guidance.</p>
<p>Elma Birrell, St Michael's Parish Church (SMPC)</p>	<p>Vennel car park – retain to serve the church buildings in the area.</p> <p>Vehicle access to Manse and Kirk Hall via the car park would need to be protected</p> <p>Vennel flats – sensitivity to the needs of the residents should be paramount.</p> <p>Visual impact of any proposals on the church's properties would need to be carefully considered.</p>	<p>Any proposal would be assessed by the council's Roads and Transportation Service as is standard practice; reference to a parking assessment has been added to the Planning Guidance.</p> <p>Access points have been indicated on the revised plan for neighbour buildings; as above access will be assessed at proposal stage.</p> <p>Point noted; pre-application consultation stage will address neighbour issues;</p> <p>Reference to Visual Impact Analysis has been added to the Planning Guidance.</p>
<p>1st Step Group, (1SG), Linlithgow</p>	<p>Community space - seek community space to be included in the planning guidance due to the visibility of the Vennel site which have found over time is linked to their continuing development and success; recognise that other space either is or may become available in and around the town in the short to medium term, the opportunity to create a flexible hub space in the longer term which can be used across a number of local groups needs to be recognised in the guidance.</p>	<p>There are many community spaces, indoor and outdoor, within Linlithgow; the Linlithgow Partnership Centre (Tam Dalyell House) will provide additional space.</p>

	Dedicated space - the group currently operates over more than one site and would benefit greatly from the kind of space which would be offered by a single location in the Vennel site and have been in contact with the Community Trust in this regard.	Issue is beyond the scope of the Guidance; no change to Planning Guidance.
<b>(4)</b>	<b>SCOTTISH GOVERNMENT (QUANGOs)</b>	
Historic Environment Scotland (HES)	<p>HES broadly welcome the provision of guidance to direct future development in this sensitive area of Linlithgow</p> <p>Early engagement and dialogue on any proposals that may come forward for the site is welcomed with the local authority and prospective developers to discuss how this potential might be delivered</p> <p>Path - The section of path adjacent to the loch which falls within the site boundary is in the ownership of Scottish Ministers.</p> <p>HES Consider that the proposed uses are appropriate.</p> <p>HES welcomes that the guidance outlines heritage assets which may be affected by the development of this site, and gives direction on relevant policy for their protection.</p> <p>Historic townscape and context - HES consider sections on urban design and development approach in particular could be stronger in emphasising the necessity of understanding and responding to the historical development of the current townscape. In large town centre re-development sites such as this, we find successful schemes are generally accompanied by a thorough analysis of the historic environment, which in turn can provide inspiration for the layout, form and appearance of a finalised design. The PG should seek to build upon the specific location of the Vennel and its relation to the Palace and medieval burgh.</p> <p>Archaeology - there is potential for desk-based study and archaeological techniques to inform development proposals which would support place-making and distinctiveness.</p>	<p>Support for guidance noted.</p> <p>Important advisory role of HES regarding the historic setting and environment is noted.</p> <p>Noted.</p> <p>Support for proposed uses noted.</p> <p>Support for guidance on heritage assets is noted.</p> <p>The Historic Environment Scotland guidance: <i>New Design in Historic Settings</i> (2010) has been added to the Planning Guidance; requirements for historical analysis of townscape and Heritage Statement to accompany any forthcoming planning application have been added to the Planning Guidance.</p> <p>Requirements for historical analysis of townscape and Heritage Statement to accompany any forthcoming planning application have been added to the Planning Guidance. Requirement for an archaeological survey has been further added as a standard requirement to the Planning Guidance.</p>

	<p>Scheduled Monument consent - map identifies that part of the development area is within the Linlithgow Palace and Peel scheduled monument boundary. HES recommend that the PG explains that any works in the scheduled area would require an application to HES for Scheduled Monument Consent and it is unlikely that consent would be granted for works that adversely affect the scheduled monument.</p> <p>Reference the document <i>New Design in Historic Settings</i> in the Planning Guidance.</p> <p>Developers to prepare a historical analysis / heritage statement to accompany any forthcoming planning application.</p>	<p>Reference has been added to the Planning Guidance in relation to implications of any proposals on Scheduled Monument status of Palace and its curtilage.</p> <p>Reference to <i>New Design in Historic Settings</i> has been added to the Planning Guidance.</p> <p>Requirements for historical analysis of townscape and Heritage Statement to accompany any forthcoming planning application have been added to the Planning Guidance.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>High quality Sustainable Urban Drainage Systems (SUDS) should be used in any development on this site and opportunities to retrofit SUDS should be taken, since it is unlikely that there are SUDS in the existing development.</p>	<p>Reference to SUDs and best practice has been added to the Planning Guidance.</p>
<p>Scottish Natural Heritage (SNH)</p>	<p>No comment.</p>	<p>No comment; no revision required.</p>
<p>Scottish Water (SW)</p>	<p>Water - Balmore Treatment works has sufficient capacity for development.</p> <p>Wastewater - Linlithgow Treatment works has sufficient capacity for development.</p> <p>Pre-Development Enquiry - to allow us to conduct further assessment of the development's impact on the local network we encourage the Developer to submit a Pre-Development Enquiry (PDE) form (found at <a href="http://www.scottishwater.co.uk">www.scottishwater.co.uk</a>). We recommend all planned development relating to more than a single house connection submits a PDE to Scottish Water as early as possible. When the Developer submits the completed PDE form - supplying as much information as they can about the development - this detailed information will allow us to determine if further investigation on the local network is required. Please note there is existing infrastructure within the site. We would hope that these water mains/sewers can be accommodated with the appropriate standoff areas in our current guidelines adhered to, if this is not possible the developer will be required to design a diversion with approval from our Asset Impact Team who should be consulted when such an occasion arises.</p>	<p>Noted that there is currently site capacity.</p> <p>Noted that there is currently site capacity.</p> <p>Reference to early engagement with Scottish Water has been added to the Planning Guidance.</p>

	<p>Early engagement is recommended and the Developer can contact our Asset Impact Team using <a href="mailto:service.relocation@scottishwater.co.uk">service.relocation@scottishwater.co.uk</a> as early as possible so that these can be investigated further.</p>	<p>Reference to early engagement with Scottish Water has been added to the Planning Guidance.</p>
<b>(2)</b>	<b>WEST LOTHIAN COUNCIL</b>	
WLC Environmental Health	<p>Regarding parking requirements, because Linlithgow is an Air Quality Management Area (AQMA) it would be useful to provide charging facilities for electric cars, bike shelter or bike facilities for other forms of transport.</p>	<p>Requirements for bike shelter/ facilities &amp; EV charging point have been added to the Planning Guidance.</p>
WLC Flood Risk Management	<p><i>Flood Risk</i> - SEPA's Flood hazard maps suggest that parts of the site are at risk of flooding from surface water. Although the maps are prepared using coarse data not suitable for assessment of risk at a property level, the data that they provide does accord with local knowledge. In particular large volumes of surface water run down Dog Well Wynd into the High Street and surcharging sewers cause water to rise out of the road gullies when the capacity of the combined sewerage system is temporarily exceeded. It is considered that the potential damages can be avoided though detailed site-specific assessment, sound design and construction but the developer will be expected to demonstrate this.</p> <p><i>Sustainable Drainage &amp; Mitigation of Flood Risk</i> - the following information should be submitted and approved before consent is issued –</p> <ul style="list-style-type: none"> <li>○ Surface water attenuation should be in accordance with CIRIA SUDS Manual C753 and the current Drainage Assessment Guide. Calculations are required to show how the greenfield run-off rate has been determined plus information on how interception storage has been included.</li> <li>○ Surface water treatment should be in accordance with CIRIA SUDS Manual C753 and the current Drainage Assessment Guide. SUDS selection should be to the new Simple Index Approach and outputs presented in this format.</li> <li>○ Sewers should be designed and constructed in accordance with Scottish Water current design and vesting standards – SFS3 is the current version.</li> <li>○ Calculations should be provided to show how exceedance is managed on site in accordance with the Drainage Assessment Guide, Chapter 8. Calculations should be provided to confirm details.</li> <li>○ Information should be provided to confirm how soft landscaped areas are to be drained</li> <li>○ Information to be provided showing what sewers are to be vested in Scottish Water, what sewers are to be adopted by WLC as road drainage and what assets (SUDS</li> </ul>	<p>Requirements for flood risk assessment have been added to the Planning Guidance.</p>

	<p>etc.) are proposed to be jointly maintained between SW and the Council under a prospective section 7 arrangement.</p> <ul style="list-style-type: none"> <li>o Details should be provided on how surface water run-off will managed during the construction period.</li> </ul>	
<b>(2)</b>	<b>RESPONSES OUTWITH CONSULTATION PERIOD</b>	
Transition Linlithgow	<p>(Submitted before consultation commenced in response to the committee report to Development and Transport PDSP 3 April 2017)</p> <p>Community Orchard - planted by Transition Linlithgow between the flats and the loch-side on council land with the approval and support of the council.</p> <p>Key location - this space is a sensitive and critical one to our town centre, and has the potential to address major issues including air quality, noise pollution, sustainable transport choices and support for high street businesses.</p> <p>Please allow sufficient time and a genuine consultation process, so that an excellent design solution can be developed.</p> <p>Greenspace - prominent high street flower bed which volunteers from Transition Linlithgow design, plant. Seek equivalent flower bed space in the redesign</p> <p>Trees - number of trees in this area should be increased rather than decreased during the redevelopment.</p> <p>Engagement in community gardening has been proven to benefit mental and physical health, and there is the opportunity to create growing spaces for both residents and community groups.</p> <p>Should ensure that green spaces are properly considered, but to meet horticultural needs such as soil quality, depth, drainage, water retention, access to water, and also safe access for maintenance.</p> <p>The quality of the buildings to the East of this site are sub-standard with local residents contacting us to examine their issues and give guidance.....dampness, windows needing replaced, poor insulation.</p> <p>The Council's brief should be true to its legal obligations on Climate Change.</p>	<p>Tree survey to be undertaken including all trees on site.</p> <p>Beyond the scope of the site redevelopment guidance.</p> <p>A PAC is required from the developer and reference to this has been added to the Planning Guidance.</p> <p>Consideration of a replacement community flowerbed added to detailed Landscape Plan requirement.</p> <p>A detailed landscape plan and tree survey is required of the developer.</p> <p>Community gardening is not a suggested use for the Planning Guidance; there are other potential sites in Linlithgow and West Lothian.</p> <p>A detailed landscape plan and tree survey is required of the developer; reference to this has been added to the Planning Guidance.</p> <p>These are matters for WLC Housing; The Vennel flats are outwith the site area.</p> <p>The guidance includes sustainability requirements.</p>

Janice Scott	Email received after closing date: seeking to reply to community groups consultation.	Advised of correct email & re-directed.

**ACRONYMS & ABBREVIATIONS**

- AQMA - Air Quality Management Area
- EV – electronic vehicle
- HES – Historic Environment Scotland
- LCT - Linlithgow Civic Trust
- LCDT - Linlithgow Community Development Trust
- LLBCC - Linlithgow and Linlithgow Bridge Community Council
- LYPP – Linlithgow Young Peoples Project
- PAC – Pre-Application Consultation (an early application through the planning process to allow for wider consultation)
- PDSP – Planning Development and Scrutiny Panel
- PG – planning guidance
- SEPA – Scottish Environmental Protection Agency
- SUDS – sustainable urban drainage system
- Table A - *Summary of Additional Documentation and Assessment* appended to final version of planning guidance
- WLC – West Lothian Council
- WoSAS – West of Scotland Archaeological Service (consultants to WLC)