



Transition Linlithgow

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To: Development Planning
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Ref: Response on WLC Main Issues Report

To whom it may concern.

I am writing on behalf of Transition Linlithgow and as their chairman to offer comments on West Lothian Council's Main Issues Report (MIR).

Members and supporters of Transition Linlithgow appreciate the complex task your staff have of trying to meet future housing and employment needs whilst balancing issues of location, heritage, transport, education and environment and so on.

Our charity is based in Linlithgow and is primarily concerned with our town and it's surrounding rural region irrespective of council boundaries. Our objectives are to transition our community away from a high-carbon, oil/gas dependant, lifestyle to one which is more sustainable¹, local and resilient. Our primary focus is on energy, food, transport, economy and waste as well as developing the social capital needed to build and maintain a healthy and connected community.

At the most recent recent UN Climate Summit in New York (Sept 2014), Rajendra K. Pachauri, Chairman of the IPCC, made an opening statement from which I've taken the liberty to extract a few paragraphs which give context for our views. He stated:

"...we have abundant evidence that we are changing our climate. The atmosphere and oceans have warmed, the amounts of snow and ice have diminished, and sea level has risen. Each of the last three decades has been successively warmer at the Earth's surface than any preceding decade since 1850.

***Our time to take action is running out.** If we want a chance to limit the global rise in temperature to 2 degrees Celsius, **our emissions should peak by 2020.** If we carry on business as usual, our opportunity to remain below the 2-degree limit will slip away well before the middle of the century.*

....

It comes down to a matter of choice. We can continue along our existing path and face dire consequences. Or we can listen to the voice of science, and resolve to act before it's too late."

¹ Sustainable development was defined by the United Nations World Commission on Environment and Development in the 1987 Brundtland Report as:
*"those paths of social, economic and political progress that meet the needs of the present **without compromising the ability of future generations to meet their own needs.**"*

Tough words from the head of the scientific community which we reiterate: *“time to act is running out”* and *“emissions need to peak by 2020”*.

Clearly a ‘business as usual’ strategy will not work and hence the need for public, private and voluntary sectors to work together and plan for a future where jobs, housing, transport, energy supply, food and even education will be quite different.

With this in mind we must consider the lifespan of a new LDP against Climate Change (Scotland) Act targets and milestones. i.e. 42% reductions by 2020 and 80% reductions by 2050.

If we presume the estimated 10 year lifespan of the LDP and it being 2014 now, then just one revision of the LDP takes us through the 2020 date where under Scottish Gov targets, 42% of the GHG reductions need to be achieved and when Scotland’s part in global emissions need to have ‘peaked’ as indicated by international scientists of the IPCC.

The Local Development Plan is one of the primary policy documents through which we can influence many of those emissions reductions and carbon sequestration too.

It needs to have a clear strategy on renewable energy supply, energy conservation, active and sustainable travel, a vision for a more localised food supply-chain, a low-carbon employment capacity, waste minimisation and carbon sequestration.

While our organisation does not have the resources to scan every paragraph in the MIR or it’s supporting documents, we do wish to express some broad and specific views which we hope will be taken into consideration.

From a strategic perspective.

The MIR appears to be locked to the SDP which prioritises Economic Growth, housing capacity, environmental conservation, green networks, development of brownfield land, infrastructure and lastly climate change adaptation and mitigation. This is re-enforced by the council’s own priorities which place climate change and protecting the environment as No.s 7 and 8. Well forgotten at the end of a long list.

Our primary concern is that this reads as ‘business as usual’ and contrary to the advice of global scientific community who are advocating a major shift over the next 10-20 years.

“Climate Action” comes across as an afterthought in the whole document. A bolt-on to validate a biased focus on economic growth through development. This is a “Main Issues Report” which fails to properly define or prioritise the ‘real’ main issues that we face on earth today. Climate Change must NOT be an afterthought, but at the core of our very intentions to manage development across West Lothian region.

We would like to see the final LDP focusing on:

Energy:

- * A West Lothian Energy Strategy to be produced for the whole region as well as a strategy on major energy conservation opportunities.
- * A clear partnership and action plan created between WLC, Mill Road Industrial Estate BIDS, Linlithgow High St. BIDS and the newly formed Linlithgow Natural Grid Ltd. to take Linlithgow towards energy independence through a series of projects and policies which learn from best practices across Europe and in particular Denmark/Norway etc.
- * A West Lothian Heat Map report and identification of new development sites which optimise natural heat sources or where new district heating and other shared energy solutions work most efficiently and cost effectively.
- * A Solar Strategy to harness this renewable energy source and to design new developments to make the most of the solar gain. This should include protection to avoid new development which might overshadow these existing solar thermal and solar PV installations.
- * A Hydro strategy for the region, working in partnership with other local authorities to maximise the energy potential from rivers, lochs, canals and other water resources.
- * An assessment of deep hot and wet rocks and provision to drill and explore the potential for deep geothermal heating solutions. This would be extended to assess the opportunities of extracting heat from old coal mine workings and lime caves, etc.
- * Provision for an increase in forestry land and specifically in coppiced crops which can be used for wood fuel or other timber products.
- * A policy rejecting ALL coal bed methane extraction or similar Fracking practices in the WL region.

Economy:

- * A plan which enables the delivery of a low-carbon & resilient local economy. Maximising the potential of renewable energy, improving existing built environment to be energy efficient, formation of co-working hubs and improvement in Broadband in town centres to reduce commuting, protecting and restoration our natural environment, increasing the sharing economy, minimising waste and maximising capacity to recycle and re-use goods, increasing local food production and consumption, etc.

Food and Land:

- * A West Lothian Food Production policy, which defines land suitable for food production by class and adjusted for climate change weather variances, thus protecting prime agricultural soils.
- * A linked green-space strategy that defines and protects communities from in-fill development and encourages the restoration of contaminated and damaged land.
- * Identification of Land for community allotments, orchards, market gardens, glasshouses, poly-tunnels, to enable the increase of locally produced food and the associated economic and employment opportunities in the food sector.

Transport:

- * By 2020 at least 10% (ideally more) of all journeys are made by bicycle. To achieve that we improved infrastructure particularly need more safe cycle routes designed and delivered within all towns in West Lothian.
- * EGIP needs implemented in full including the new Winchburgh train station.
- * Air quality matters resolved and a block on any further development until a detailed action plan is in place along with a detailed assessment of the negative impact of any

future development within the town. This assessment needs to consider PM2.5's as well as PM10's and NOx. It may be relevant to other towns which also have AQM issues.

- * Paths, pavements and bus services should be improved (quality and quantity) for Linlithgow/Linlithgow Bridge. L1 service is insufficient and does not serve the south of the high street where the gradient is more challenging for cyclists and pedestrians.
- * Linlithgow High St needs re-designed to remove on-pavement parking and incorporate proper parking bays as per the Halcrow Fox design document, and also to narrow the main carriageway or shift the central road markings. The present 2xCar width highway on each side encourages double parking and with no traffic warden, the town is suffering and becoming a 5 car wide congestion zone. Policing is not enough and proper road and pavement design techniques need to be employed to make the High St safe for pedestrians, cyclists and finally car users. More space is also required for business delivery zones and car parking charges should be changed so that the High St has a cost, but the Cross Car Park is free. The reverse of the present design. This reverse would encourage cars to park away from the high st.
- * A detailed assessment of parking needs should be completed prior to decisions on any new development. For cars, buses, short and long term stay, etc.
- * No new roads should be constructed. M9 slip roads at Burghmuir should only be considered after a detailed traffic and air quality assessment is done.
- * Formation of new segregated safe cycle lanes/routes for inter-town connections (in particular north-south connections from Linlithgow)
- * Canal towpath widened and ramped connections upgraded for its entire length within WL region and beyond in partnership with other local authorities.

Housing:

- * A housing & land resource policy which favours more compact living arrangements such as co-housing and low-level flats, terraced houses ideally designed with shared infrastructure and minimal land use for development. Current development tends to favour detached properties and large gardens.
- * A new policy to re-purpose empty buildings and support their conversion into housing (e.g. Stuart House, Linlithgow), with a focus on reducing the amount of empty accommodation above retail shops on our high streets.
- * All new housing should be located as close as possible to existing town centres but balancing the need for quality green-space too.

Waste:

- * Additional land and facilities to enable new social and environmental enterprises to form with a focus on: re-use & repair, resale prior to recycling. Sites should be adjacent to existing council recycling centres.

In addition we would like a more detailed focus on the following local issues:

- * Linlithgow Loch Water Quality - to define the development/infrastructure related actions required.
- * Linlithgow High Street Air Quality - a full study on the changes to air quality for any proposed developments in the MIR and expansion of the study to include PM2.5 particulates.
- * Flood Risks (as per SEPA mapping) - a documented strategy to mitigate any risks associated with flood risk zones.

In summary, we feel that the MIR and forthcoming LDP fails to properly prioritise the challenges and opportunities that come with Climate Change. A focus on creating a low-

carbon future would place West Lothian firmly on the map with ambitions and strategies to create one of the best resilient and sustainable regions of Scotland. In this context, economic rewards would be an outcome rather than the primary aim and all forms of life on earth will all benefit from that shift in focus.

We trust this response is of benefit to the council and it's planning and economic development departments and specifically to the MIR and LDP team.

Yours faithfully
on behalf of the members of Transition Linlithgow

Alan Brown
Convener & Trustee