

The Proposed Plan does not recognise or define the impacts and what, if any, mitigation measures are required as a consequence of the LDP spatial strategy on the trunk road network. Additionally, the LDP does not define any cross boundary effects of development to the trunk road network, specifically at Newbridge. In order to do this the Proposed Plan needs to identify the interaction of traffic generated by the Proposed LDP allocations within the West Lothian area and out with the boundary on the trunk road network, specifically looking at Newbridge.

Section 5. Representation

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. If you are attaching additional documents as part of your representation you must refer to these in this section of the form and include a summary of their content. Representations which simply state “see attached” or similar will not be accepted and will be returned.

A Transport appraisal has been undertaken to understand the transport effects of the LDP spatial strategy and to identify the transport interventions needed to mitigate any effects. This appraisal is detailed in the Proposed Plan’s supporting documents: ‘*Transport Appraisal and Modelling*’ dated 2014 and ‘*Transport Appraisal - updated October 2015*’.

Transport Scotland has two areas of concern in relation to the Transport Appraisal;

1. The Transport Appraisal does not clarify the transport effects of the Proposed Plan spatial strategy within the West Lothian area on the trunk road network or the need for any transport infrastructure to mitigate any effects on this network.
2. There is also no information provided on the potential impact of West Lothian’s LDP allocations on the trunk road network out with the Council boundaries, particularly at Newbridge junction located within the City of Edinburgh Council area.

Transport Appraisal

The ‘Transport Appraisal – updated October 2015’ states in paragraph 1.2:

“Transport Scotland was consulted on the brief for this appraisal and at each stage in the appraisal process.”

Additionally it states in paragraph 1.3:

“Transport Scotland welcomed the approach taken by the Council, and has not raised any fundamental concerns about the road infrastructure proposals of the Plan.”

Transport Scotland has not been involved at each stage of the appraisal. Transport Scotland provided comments on the Transport Appraisal at the Main Issues Report

stage following a meeting with the Council on 9 September 2014. Following this West Lothian Council did not discuss the content of the transport modelling and assessment work with Transport Scotland prior to publication of the Plan.

The comment stating Transport Scotland has not raised any fundamental concerns is inaccurate. At the MIR stage and through its MIR response, Transport Scotland stated the need for the Appraisal to determine any potential impact of the West Lothian LDP allocations on the strategic network within West Lothian and on the trunk road network out with the council boundary, specifically at Newbridge junction. Given the above it has not been possible to arrive at a fully informed position relating to any potential effects or required measures.

After reviewing the Transport Appraisal, Transport Scotland is not content that the Council has satisfactorily appraised the potential impact of the LDP traffic on the trunk road network within West Lothian, as the new M9 junction at Winchburgh is not included within the model. The omission of this junction could significantly affect travel patterns resulting in inaccurate information.

Consequently, the Appraisal does not provide sufficient detail on the potential effects of the Proposed Plan on the trunk road network within the Council area.

Cross Boundary

Paragraph 5.124 on page 36 of the Proposed Plan outlines the SESplan cross boundary study which will identify required mitigation measures at specific locations to address the nature and scale of the impact of the SDP allocations.

With regard to the issue of cross boundary effects, the Reporter's Recommendations detailed within the DPEA's Report to Scottish Ministers on the Examination of the South East Scotland Strategic Development Plan, dated 12 April 2013, included the following recommendation:

[SESPlan]

Policy 8

Transportation

The Local Planning Authorities in collaboration with Transport Scotland and SEStran will support and promote the development of a sustainable transport network. Local Development Plans will:

[Reporter's Recommendation]

5. Add a new part f to Policy 8, which reads as follows:

"Take account of the cross-boundary transport implications of all policies and proposals including implications for the transport network out with the SESPlan area."

This issue is of particular concern to Transport Scotland with regard to the M9(T), specifically Newbridge. In the absence of an assessment of the cross boundary impacts of the proposals included in the Proposed Plan, Transport Scotland is currently unable to support the Proposed Plan.

Following discussions between Transport Scotland and West Lothian Council a technical paper is being prepared by West Lothian Council which will provide further

detail on the modelling methodology and the above concerns. Transport Scotland will review this information when available and will continue discussions with the Council on the extent to which this addresses concerns raised.