SPOKES *West Lothian*

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The Director of Planning
West Lothian Council

Attention: steve.lovell@westlothian.gov.uk

29 December 2011

Dear Sir

WLC supplementary planning guidance: Residential Development Guide

Thank you for this opportunity to comment on the above.

I am writing on behalf of Spokes West Lothian. We support the points in the submission by Peter Hawkins on behalf of CTC and of the central Spokes planning group.   Those comments raise several major issues as well as smaller specifics.

However, this letter is to make a number of smaller concrete specific suggestions for how the actual wording of the plan should be modified. This letter gives very little justification for its suggestions, as the justifications are in general found in Peter Hawkins's submission. Finally, this letter does not attempt to cover all the major issues identified in Peter Hawkins's letter, some of which would involve more substantial changes than we have the time to suggest in this letter, but we trust that the council will nonetheless consider if and how those major issues could be incorporated into the Guide.

Generally speaking, we are pleased at the consideration which has already been given to cycling and walking, but we are concerned that some of the detail could be made more concrete.
Finally, the real test will of course be the extent to which the Council insists on the principles and practices in the Guide being implemented in real-life decision-making.

Yours Sincerely
Dave du Feu

Suggested new wording *is in* red font.

p5 para 4   "It is uniquely placed to direct development to locations with excellent walking, cycling and public transport accessibility, to encourage sustainable design..."

p7 para 6   "... environmental sustainability principles, with excellent walking, cycling and public transport accessibility to facilities such as shops and schools, low in carbon..."

p9 Connectivity   *Critical issue* - this is a basic and critical issue for genuine sustainable development, and so deserves its own entry rather than being lumped in with Open Space. Remember that connectivity for cycling (and walking) is often best provided onroad, or beside roads, these often being the most direct connections. Whilst walk/cycle paths through open space are often very pleasant, and sometimes form useful connections, the top consideration must be connectivity – i.e. *easy and direct access to shops, schools, rail station, etc*. We suggest: "Identify existing and potential walking, cycling and public transport access routes between the development and community facilities, including local shops and schools. It is essential that onroad and offroad cycling facilities are discussed with the Transportation cycling officer as well as NETS/ Land Services."   The existing 'Open Space' issue should then be modified to delete the last 6 words, about connectivity.

p9 Public transport   "... required, including foot/cycle path connections to bus stops, and secure cycle parking at main bus stops, normally with CCTV coverage.   Such improvements to be funded by the developer."

p9 Transportation   Spelling – advice, council's, assessments

p9 house building   Add "Ensure secure cycle parking in line with council standards, including management where communal facilities are provided, e.g. for flats"

p12 para 2, last sentence   "... amenity space, circulation and good pedestrian and cycle accessibility and connectivity to local facilities."

p13 para 3   "... open spaces, foot/cycle paths and …

p14 para 7   Add "However, all developments should appear as public space, and 'gateways' should feel welcoming to the public rather than denoting a private enclave."

p15 para 5   "Residential streets must be designed as pedestrian and cyclist friendly places..."

p37 Car parking   Rename this 'Parking Standards.' Add new paras...

"Major developments, particularly those with high accessibility to local facilities and rail services, should consider providing Car Club facilities, in association with one of the national operators such as CarPlus. This could significantly lower individual parking requirements, leaving more space for productive development, whilst also encouraging more healthy and carbon-reduced lifestyles."

"Secure and convenient bicycle storage is an essential requirement for a sustainable development.   Where garages are provided these are suitable if they have sufficient space; otherwise in-house provision or shed space easily accessible without walking through the house are required.   Communal bike parking facilities may be acceptable (for example for flats) if they follow the principles in the Cycle Storage section below."

p38 table   The repeated sentence, "Where residents have access to a garden or garage no provision is necessary" should be replaced by... "Provision may comprise a garage with adequate space, or a private garden easily accessible from without the house."

p41 walking & cycling   Combine and rewrite 1st & 3rd paras, as follows, "It is important to be aware of and to understand pedestrian and cyclist desire lines, taking into account the location of the site, the pattern of existing infrastructure, and the location of important destinations such as shops, schools, rail station, bus routes, leisure facilities, etc. It is essential that connections are provided to such facilities and it is equally important that they are direct and convenient, as well as safe and welcoming. Pedestrian and cycle routes may often be located along residential roads (also providing natural surveillance) where these are direct, but with path links to provide direct access to facilities where motor traffic takes a more circuitous route. Where road crossings are required, toucan and/or pedestrian-only crossings should be provided, as appropriate to the location, with consideration given to cyclist/pedestrian priority at such crossings."

p41 walking & cycling   Add new final para, "Within residential developments priority for pedestrians and cyclists should be the norm, this being made obvious to drivers from the design and any necessary signage. In particular, the local streets should be safe and welcoming for children to play in, and for people of all ages, experience and abilities to feel comfortable to cycle along. Very careful consideration should be given to the choice of materials and to detailed design, so as to provide the best possible conditions for walking and cycling – for example avoiding cobbles and kerbs on cycle desire lines, car parking at path exits, etc."

p41 Cycle storage   Add new 3rd para, "Where communal bike storage is provided (whether within or without the residential building) the developer must demonstrate adequate management arrangements, to ensure security and to ensure maintenance of the facility."

p42 TA   Add new final sentence, "The Transport Assessment provided by the developer should also take full cognisance of the transport-related elements of this Guide, to ensure holistic consideration of connectivity, accessibility to facilities, etc."

p47 Sustainability   Add new 3rd para, "Choice of development location is probably the single most critical factor in ensuring a sustainable and energy-minimising development. Every day the majority of residents are likely to be travelling from the development to work, shops, schools, leisure opportunities, etc. Easy and convenient accessibility to frequent rail and bus services, and to the above facilities, is vital, through choice of location and provision of direct, welcoming and safe cycling and walking routes."

p48 Energy   The above para suggested for p47 could alternatively be placed here, as a new 5th paragraph. The present wording fails to emphasise the importance of choice of location, mentioning this only in relation to public transport hubs and only as one item in a long list.

p68 Checklist   We are very pleased to see "Are the routes for pedestrians and cyclists to main destinations as direct as possible?" That question should definitely be retained. However, immediately under it should be an *additional* question, "Do these routes look and feel as welcoming and safe as possible".