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To: West Lothian Council, Planning & Development planning@westlothian.gov.uk

17.10.14

WL LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT [MIR]

We regret that we have not had the time to produce a detailed response to the entire document.

We support the submission to the consultation by Linlithgow Cycle Action Group.

Additionally, our comments on specific sections of the draft MIR, transport section, are as follows...

3.136-3.146 Integration of development

We support this approach, provided that maximum effort and resources go into sustainable and active travel, reducing the need to travel, ensuring sustainable planning and location decisions; and that the 'balanced approach' is not used as an excuse to continue business as usual.

3.143 Support for cycling and cycle routes

We support this section, but are concerned that it implies that all cycling development should be offroad.

The road network goes from every A to every B, and main roads often use the most direct and least hilly route. **Therefore the road network must be fully cycle-friendly**. This means safe and welcoming provision (normally segregated) on **main road corridors**, 20mph limits plus appropriate infrastructure on **local roads** and, on **rural roads**, reduced speeds and cycle-friendly roads following the excellent example of Clackmannanshire, http://www.clacksweb.org.uk/transport/friendlyroads/,

Furthermore, the level of commitment in this para is too general. We suggest specific commitments/goals at the end of this submission.

3.144 Car parking relating to public transport

There is a temptation to aim for maximum free car parking at every rail station, regardless of any form of demand management. Instead, the approach should be to use forms of **demand management** such that people living near stations are encouraged to walk and cycle to the station, leaving car spaces for those who genuinely need them. A prime example is Linlithgow which has a small station car park. Much of this car park fills early with all-day commuters, many of whom may well live fairly close by. There should be charges for this car park, possibly with a free initial 20 minutes to allow drop-off and collection, and with a very hefty fee if a car stays all day. Several station car parks in other authorities do charge – for example Dunbar and Falkirk. Why is West Lothian behind on demand management?

Obviously 'carrots' to improve walking/ cycling/ bus to stations are vital, but positive demand management to reduce car pressures are equally vital.

3.148-3.149 Pressures on town centres

We are very concerned that the solutions listed to town centre congestion, and other 'network bottlenecks' again do not include demand management, such as effectively implemented car parking restrictions.

For example, **town centre onstreet car parking** is often permitted to an excessive extent, ruining the pedestrian environment and increasing actual and perceived danger for people wishing to use a bike, thus seriously deterring potential cycle use. **Linlithgow High Street** is a prime example - conditions here could be greatly improved by the onstreet car parking being reduced and properly managed. Onstreet spaces should be effectively enforced as short-term parking, to allow customer turnover at local shops. Local surveys show that many High Street car spaces currently are occupied for extended periods – this is an absolutely shocking *misuse of prime town centre space* and should be a top priority for action.

3.154-3.155 High Speed Rail

The MIR just states the position on Edinburgh-Glasgow HST without taking a view on it. **We urge the Council actively to oppose this proposal**. There is a huge opportunity cost loss here – vast sums, *literally £bn's*, will be spent which would be far better allocated to local rail services. Secondly, there are already 4 lines between Edinburgh and Glasgow. Thirdly, the HST line would bring no benefit at all to West Lothian, but instead would result in further Edinburgh/Glasgow economic development at the expense of intermediate areas such as West Lothian.

Finally, although rail in general is a sustainable form of transport, HST is much less so and any such claims should be challenged.

3.156-3.159 Walking and Cycling

We do not object to these paras, but their order is wrong and they are insufficiently powerful.

In particular we re-emphasise the point made in 3.143 above about the importance of *making the road network cycle-friendly*, and the comments there on how this should be done in relation to **main roads**, **local roads** and **rural roads**. Therefore, the first para here, i.e. 3.156, should cover this issue, with the para on core paths etc appearing later. **This is a fundamental issue**.

Appendix: Specific Commitments suggested for the Local Development Plan

The eventual Plan should include the following commitments and targets...

- A fixed minimum percentage of the Council transport budget (capital and revenue) should be allocated to cycling investment, as Edinburgh City Council has done for the last 3 years [5%, then 6%, then 7%]. West Lothian has a recent good reputation for cycling investment notably the big success in obtaining £1.8m Sustrans cash, which is only possible because the Council has agreed to invest 50/50 match funding. The Council also comes out well in the latest annual Spokes survey of Scottish cycling investment [Spokes Bulletin 120, forthcoming]. However, these are one-off sums year by year, whereas allocating a known minimum % of the transport budget allows more effective long-term planning of cycle development.
- By year X [to be decided] **every major residential area** in West Lothian should be linked to its local town centre by a convenient and attractive cycle route, with the aim of at least 10% of local trips being made by bike (to reflect the Scottish Government's national target for 2020).
- By year Y [to be decided] every *residential* and *shopping* street, and *every other street with significant numbers of walkers and/or cyclists*, should have a **20mph speed limit** (this is now policy in Edinburgh's Local Transport Strategy); and that the default for all other urban roads should be 30mph (with exceptions decided on an individual basis).
- By year Z [to be decided] every **main road** in West Lothian should have safe and welcoming cycle facilities, normally segregated, as is already the case for much of the A89.

We hope these comments are of use

Dave du Feu for Spokes West Lothian