

Please use this form to respond to the [draft topic schedules](#). If you are responding to multiple schedules then please use a separate form for each schedule you are responding to.

Do not submit any sites or proposals.

Q1 - Name of respondent / or if you are responding on behalf of a person, business or organisation

Dave du Feu, on behalf of Spokes West Lothian and Spokes Linlithgow

Q2 - Schedule to which you are responding

22. Sustainable Transport Infrastructure

Q3 - Do you agree that the evidence set out in the schedule is sufficient? Please explain why. If not go to Q4

No

Q4 - If you dispute the evidence set out in the schedule, please provide your reasons below:

Firstly, several items in LDP1, where [we commented back in July 2024](#) in the consultation on the draft LDP1 Delivery Plan, have not in fact been delivered. Explanations and intentions should be given. These *include* (with the references in that document)...

- P-35 Dalmeny chord rail line
- P-91 Winchburgh Rail Station – although there does at last seem to be some progress in setting up the necessary processes and finance
- P-102(b) Union Canal accesses, notably from the Springfield estate via Maidlands
- P-108 Quality separated cycle provision on the A803 town centre out along Blackness Road and to the B903
- P-113 Linlithgow/Bathgate/Beecraigs scheme
- P-115 Linlithgow Town Centre traffic management - making the High Street safer and more welcoming for cycling, walking and shopping should be the top priority to encourage modal shift to active travel in the town

Turning to the new LDP2 Topic Schedule 22, *Sustainable Transport Infrastructure*

1.3 Climate change targets should say “.. this target was out of reach *because the necessary steps to achieve it had not been taken.*” It is not sufficient just to say that the target was out of reach – the reason *why* should be included as evidence, to make future failure less likely.

1.9 Car-use reduction This should refer to the fact that strong demand management is essential to any policy to reduce car use. It is no use talking of a “steadfast commitment” when the most effective policy lever is not even mentioned. We note that the government’s own [commissioned research](#) showed that even the ‘20% by 2030’ commitment was feasible with appropriate demand management measures – but these were not taken (i.e. a similar reason for failure to that on climate, 1.3 above). This research is important evidence.

2.1-2.10, Active Travel

a. Active travel (like most other forms of travel) includes a range of purposes, commuting, shopping and other utility trips, recreation, and so on. The tendency in the past has often been to provide facilities which are primarily useful for recreation, for example disused rail lines or other offroad tracks. These certainly often do provide excellent recreational opportunities, but if they provide direct or convenient commuting, school or shopping routes it is often by chance as much as by design.

b. Given that cycling trips are now seen as an important part of reducing car dependency, much more emphasis needs given to routes which serve utility purposes and are as direct and level as possible. This generally means segregated routes on or beside main roads. For example, the current iteration of Edinburgh Council's Mobility Plan ([Active Travel Delivery document](#)) specifies the 'Primary Cycle Network' to comprise mainly segregated routes on main roads; whereas in previous iterations the Active Travel Action Plan relied for its core on the city's network of offroad paths, and which are now termed the 'Secondary' network.

c. *Suggestion* - It is good to see a fairly similar approach in 2.4-2.9, particularly 2.9, of this West Lothian LDP2 Sustainable Transport Topic Schedule. However in each of the three 2.9 bullet points, it would be good to see a further sentence describing the type of infrastructure primarily involved. For example, 'Primary' might say it would normally comprise segregated routes on or beside main roads, Secondary might be a mixture of segregated routes, quieter roads and offroad paths, whilst the final one might include quiet residential roads, traffic-reduced areas, and so on.

d. *Suggestion* - The Active Travel section (after introductory section 2.1) would best begin with the overall philosophy of how the Council now intends to cater for and encourage active travel as a means of transport for everyday journeys, i.e. as in paras 2.4 onwards. The existing paras 2.2 and 2.3 cover infrastructure which is largely recreational, though, incidentally, may also have utility function. As such these paras would fit best at or near the end of the Active Travel section.

2.16 secondary bus network

a. Since Falkirk-Linlithgow-Edinburgh is a primary bus route (2.13) it is unclear why it also appears here as a secondary route

b. A Linlithgow connection to St Johns Hospital is essential and should be included in the Linlithgow-Livingston entry (as it is in the Fauldhouse- Livingston entry)

2.39-2.57 Road Travel

This section notes the heavy and increasing dependence of West Lothian on car travel for travel, and particularly for commuting. The only solutions proposed are 'carrots', notably improved public transport, and the Local Living proposals in section 3. As important and welcome as are these proposals, they on their own are unlikely to achieve a reduction in car use. To be effective, carrots have to be accompanied by demand management.

The Scottish Government commissioned AECOM research which we referenced in 1.9 above showed that car use reduction can be achieved, and "*in an equitable manner*" by any one of several means of road-user charging. The need for demand management, and this research should again be referenced in this Road Travel section.

We note that the SEStran 2035 RTS document (section 15.3) promises, as an action, to "*Research demand management measures which may be appropriate for the region, including parking management and charges, reduced parking provision, improved enforcement of parking regulations, Workplace Parking Levies as well as congestion and/or road user charging.*" This should be reference in this Road Travel section.

Additionally, if the Council is genuinely serious about car-use reduction, and all the climate, public health and other benefits thereof, it should publicly commit to working with SEStran and with City of Edinburgh to progress such measures.

2.64-2.65 Parking Strategy

2.64/2.65 – More should be said about the negative impacts both of **pavement parking** and of inappropriate **kerbside parking**. The Linlithgow town centre is a prime example, with pavement parking positively encouraged by the council (!) and this, together with kerbside parking in other stretches, creating a hostile environment for pedestrians and destroying the opportunity for safe and welcoming cycling conditions and facilities. In a town centre shopping street, pedestrians should be able to cross the road anywhere, and should have good sightlines to do so, and cyclists should have a safe environment to get to local shops and facilities.

2.66 (table 75) – Regarding **station car parking**, where demand exceeds supply there should be charges applied, to ensure that those in greatest need of a parking space are able to get it. To take Linlithgow as an example, the station car park fills up early in the morning, doubtless including some people who live in easy walking or cycling distance, so that anyone arriving later, even if they live some distance away, does not have a space and has to use a remote car park or roadside parking. Evidence should be sought from ScotRail as to which station parks are thus affected, and the council should work with ScotRail to introduce charging, in recognition of the negative parking impact caused by people who could easily get to the station on foot or by bike.

Secondly, in regard to improving walking and cycling accessibility to stations, you could reference the Scotland's Railway project and materials, '[Railway for Everyone.](#)'

3.1-3.4 Place-based approach to reducing car dominance

We very much support this section, particularly the Development Planning Guidance in 3.4.

This, however, should not detract from, and should be seen in parallel with, the type of demand management policies referenced in 1.9 and 1.3 above.

'Summary of Implications' section

Para 1 should reference the essential role of demand reduction measures, in combination with the 'carrots' already mentioned in this para. i.e. again as in 1.9 and 1.3 above.

Q5 - Do you have any other comments on the schedule or additional evidence we could use on this topic?

Nothing in addition to the points in Q4 above