

National Transport Strategy 2 (NTS2)

Response to Draft Strategy for Consultation by Spokes, the Lothian Cycle Campaign

<https://consult.gov.scot/transport-scotland/national-transport-strategy/>

About Spokes

Spokes is a non-party-political voluntary organisation with 1200 members, mainly in Edinburgh and Lothian, founded in 1977. We aim to promote cycling for everyday transport, as part of a sustainable transport strategy, and to persuade councils and government to do the same, including through high quality infrastructure.

We welcome this opportunity to comment on the draft National Transport Strategy.

A vision for transport in Scotland

We very much welcome the vision set out in the Strategy, including the proposed Priorities and Outcomes. The change of focus from road building and prioritising private motor vehicles to enabling sustainable modes of transport such as public transport, walking and cycling is long overdue, but extraordinarily welcome. It is vital that this new policy approach is fully reflected in budgets, actions and projects.

We note the important role active travel must play in effecting the Outcomes in the Strategy – being uniquely capable of playing a part in all 12 Outcomes.

We are particularly delighted to see moves to implement the Sustainable Transport Hierarchy in transport as well as planning policy. This is long overdue, corrects a common misunderstanding, and if genuinely implemented will make a huge impact on transport outcomes.

Current and emerging challenges

Spokes generally agrees with the challenges as set out. The focus on reforming the transport system in order to reduce various forms of inequalities, including gender, wealth and age inequality is very welcome.

There are, however, several challenges which we feel are missing from the Strategy, and these must be covered in the strategy:

First, a long-time frustration of Spokes, since RTP capital funding was scrapped in 2008, has been the lack of funding and political will for **cross-boundary active travel projects** - for example between Midlothian and the City of Edinburgh. Individual local authorities are perhaps understandably reluctant to invest in cross-boundary projects, as they prefer to focus spending on projects wholly within their area and which serve their population centres. This leads to important projects being delayed or ignored. For example, detailed plans by SEStran for a vital Musselburgh-Portobello route have sat on the shelf for 3 years (so far). Similar problems to some extent also plague cross-boundary public transport. Resources from current trunk road spending should be re-allocated, whether through Regional Transport Partnerships or other means, to deal with this very serious failure of current transport structures.

One of the Outcomes listed in the Strategy's Vision section is that perceived and actual safety should improve. We agree with this, and believe that one of the key shortcomings of the current system is the failure of the justice system to adequately deal with **dangerous drivers**. In particular, the process for reporting dangerous drivers to the police is needlessly Kafkaesque, and far too many drivers are able to plead "exceptional hardship" in order to avoid driving bans when they amass 12 points (or even, in at least one case, 20 points [<https://www.scotsman.com/news/politics/hundreds-of-scots-drivers-are-on-the-road-with-12-points-or-more-new-figures-reveal-1-4847228>]). This clearly increases the dangers to vulnerable road users such as pedestrians and cyclists.

Meeting the challenges

This is the Strategy's weakest section. More thought and work is needed here in order to capitalise fully on the excellent earlier chapters. Previous experience, particularly with the Scottish Government's target to have 10% of functional journeys conducted by bike by 2020, shows that without explicit measures of success, milestones and policies and funding to achieve them, targets are likely to be missed.

We believe that specific measurable targets, including interim targets, should be set out for:

- The modal share of sustainable forms of transport.
- The total amount of vehicle-miles driven.
- Carbon emissions from transport.
- Inclusivity and accessibility of all components of the transport system.
- The number of traffic collisions, and resultant casualties.

Additionally, policies which will allow Scotland to meet these targets (and interim targets) should be set out. For example:

- Increasing the national active travel budget. We believe this should be at least £30/capita/year, in line with the Netherlands.
- Build continuous networks of cycleways in all of Scotland's cities and large towns, and then between towns, as in countries such as the Netherlands..
- Immediate development of a "roadmap" for decarbonisation of the transport system.
- Make it easier for local authorities to re-allocate road space from motor vehicles to pedestrians and cyclists. The rules on TROs/RSOs can result in inordinate delays to important active travel projects such as the current appalling delay of over a year (so far) to Edinburgh's flagship City Centre West-East Link project - following extensive consultations over the previous 3 years.
- Multi-year active travel funding for local authorities, allowing them to more efficiently plan and use their resources.
- An e-mobility policy instead of an electric vehicles policy, to explicitly include e-bikes and cargo bikes and take measures and ensure that e-bikes and cargo bikes become major modal-shift drivers for urban commuting and local deliveries. In particular, *all* publicity and programmes encouraging drivers or businesses to 'fuel-shift' should *include* publicity and incentives for modal shift, including showing the options of shifting to ebike/cargobike; rather than the current setup where EV and ebike/cargobike are promoted in separate silos.
- Councils should be required to comply with the National Transport Strategy in order to receive funding. In particular, they must implement the Sustainable Transport Hierarchy in all transport proposals.
- Sections of the National Cycle Network are currently inaccessible to many cyclists due to such things as poor surfaces, narrowly-spaced chicane barriers and steps. The entire Network should be reviewed and upgraded so that it is accessible to all cyclists, including those using handcycles, tandems and cargo bikes.
- Consideration should be given to giving responsibility for the National Cycle Network to Transport Scotland, in a similar manner to trunk roads.
- The process for reporting instances of dangerous driving should be made much simpler, in order to discourage dangerous driving and make it easier to punish those who endanger vulnerable road users. This could easily be done by copying the process followed by the Metropolitan Police.
- Implementation of any recommendations in the Cycling and the Justice System report by the All-Party Parliamentary Cycling Group which are devolved matters.
- Have step-free access to every train platform in Scotland.
- Investigate how Scotland could adopt the Dutch Sustainable Safety approach to road design and work with local authorities to develop a strategy to revamp our road network to bring it in line with its principles.
- Ensure that integrated ticketing incorporates bike-share schemes.
- Implement strict, or at least presumed, liability.
- Fully fund Bikeability training in all primary schools.

- The Sustainable Transport Hierarchy must be applied when choosing projects for the Strategic Transport Project Review (STPR 2).
- As discussed above, consider allocating funding to Regional Transport Partnerships specifically to facilitate, design and build cross-boundary active travel (and possibly public transport) projects. However, any such funding must be re-allocated from sources such as trunk road spending and *not* from the national active travel budget.
- End expansion of the trunk road system, which encourages dispersion of jobs, housing and facilities, and which increases traffic pressures in towns and cities served by them. In particular, cancel dualling of the A9 and A96. There may of course be a case for some very local safety schemes, but these should be designed not to increase traffic.
- Average Speed Cameras should be used more widely, given their low-cost efficacy, both on trunk roads (e.g. turning around the A9's former reputation as Scotland's most dangerous road) and on urban roads (e.g. hugely improving speed-limit compliance and reducing casualties on Old Dalkeith Road in Edinburgh).
- As well as being Scotland's fastest growing source of climate emissions, aviation use reflects income inequalities in society - 60% of UK flights each year are made by 10% of the population, and each year over 50% of the population do not fly at all. And yet, astonishingly, it is the least taxed mode of motorised transport in Britain, with no duty on jet fuel, vat-free tickets and duty-free retail. For emissions-reduction and for fairness, this must be tackled by the government. A progressive tax on frequent fliers has been widely suggested as a first step, and this should be included in the Strategy.

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for Spokes Planning Group
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