

STPR2 Phase 1 Interventions – Government consultation

[Consultation report](#)

Spokes response to online questionnaire, April 2021

Question	Spokes Response
Q1 - Are you responding as an individual or an organisation?	Organisation
Q2 - If responding as an organisation, what is the name of your organisation?	Spokes, the Lothian Cycle Campaign
Q3 - Please indicate which category best describes your organisation?	Community organisation
Q4 - Which of these age groups are you in?	
R5 -Do you feel the eight themes within the STPR2 Phase 1 capture what needs to be done in the short term, in relation to the transport investment priorities?	Agree
R6 - Do you feel the themes appropriately address challenges and opportunities described within the report?	Yes
R6b) - Please use the space below to provide any further comments on the challenges and opportunities described within the report:	As regards active travel, our main concern is that the funding allocated in the Scottish budget is inadequate to make a sufficiently urgent impact at a wide scale. In particular our very rough estimate is that to make Spaces for People projects permanent (i.e. redesigned and installed with permanent materials) across Scotland might take approaching £1bn. Yet only £115m is included in the 21/22 budget, and even that would have been £100m without the last minute Green party deal. And only £100m each for the next 4 years. And of course this budget is to cover far more than just SfP permanency projects.
R7 - Do you feel that the Phase 1 interventions associated with the eight themes support the priorities and outcomes of the National Transport Strategy?	Agree
R8 - Please use the space below to provide any further comments that you wish to make on the eight themes.	-
R9 - How well do the Phase 1 interventions respond to the uncertainty in travel demand and behaviour that we face in the short term due to COVID-19?	Well
R10 - How well do the Phase 1	Well

<p>interventions support Scotland's recovery from the COVID-19 pandemic in the short-term?</p>	
<p>R11 - Please use the space below to highlight the Phase 1 themes and interventions, that you particularly support:</p>	<p>(7) - Roadspace reallocation for active travel. This is absolutely essential (though certainly not sufficient) if there is to be a substantial modal shift to cycling and walking for everyday trips. We refer you to the joint STPR2 submission by Living Streets Edinburgh and ourselves on this. http://www.spokes.org.uk/wp-content/uploads/2021/03/2103-STPR2-letter-from-Spokes-and-Living-Streets.pdf. We are however very concerned that government is already doing far too little, both financially and in terms of simplifying Traffic Order processes, to ensure that Councils will have the capacity to make all successful SfP schemes permanent in a reasonable time. This would be absolutely tragic, given that in some Councils, notably our own of Edinburgh, we have seen a revolution in active travel provision in the pandemic year. Furthermore, as even the Conservative Transport spokesperson at Holyrood, Graham Simpson MSP, stated, not to make successful schemes permanent would be effectively to throw away the £39m which the government has invested in them.</p> <p>(1) Active Freeways - strongly support but £50m over 5 years (which rumour says will only happen in the 5th year) is clearly a derisory allocation if the intention is to connect many towns, cities and smaller communities</p> <p>(2) We support widespread 20mph in urban areas (with council discretion to allow 30mph on some roads, and speeds under 20 on some others). It is tragic that the Scottish Government scuppered Mark Ruskell MSP's bill which would have enabled this. The STPR2 proposal for more zones is inadequate - a Scotland-wide urban 20mph default is required.</p> <p>(3,4,5,6,8,9,10,11,12,14, 15,16, 20) We strongly support all these interventions. However, with active travel at the top of the transport hierarchy, we are concerned that it is not sufficiently integrated into the descriptions of several of these interventions, notably 8,9,10,11,12.</p> <p>Specifically on (10), good bus provision is vital for active travel - to take cars off the road, and, where segregated bike provision is not yet in place, bus lanes providing some protection from random and fast traffic. Also on (10) bus lanes need to operate by default at a minimum 7-7-7 (7am-7pm, 7 days a week) or ideally 24/7.</p> <p>Specifically on (20), why is there no mention of Average Speed Cameras? - given their excellent record in cutting dangerous and illegal speeding not just on trunk roads, but urban main roads (such as Old Dalkeith Road in Edinburgh). Furthermore, they need to be experimented with in local</p>

	<p>residential areas/ LTNs which are being used as rat-runs. Finally, we have doubts over the proposal to raise lorry speed limits, although this is not something we have studied carefully.</p>
<p>R12 - Please use the space below to highlight where you disagree with any the Phase 1 themes or interventions.</p>	<p>I stress that we do not oppose the interventions below if they are modified drastically as suggested here. However, as presented they have such major weaknesses that we have to list them under this heading.</p> <p>(13) Low Carbon Vehicles. Why is there no discussion of cargobikes here, when they are ideal for local urban distribution and are already being experimented with by some councils and used by an increasing number of innovator delivery services in some Scottish cities? Similarly e-bikes for everyday travel in place of car trips. The present government approach of treating ebikes and cargobikes in a separate silo from promotion of EVs is wholly inadequate. Every business or individual considering shifting from a fossil vehicle to an EV should at the same time be presented with the option of moving instead to cargobike, ebike, and possibly combined with car club membership, bus pass, etc. There is in fact one small isolated example where the government has demonstrated this integrated approach, but it should be totally standard. The example...https://www.transport.gov.scot/news/low-emission-zones-to-help-households-travel-better/. There is a huge literature now showing that moving to ebikes/cargobikes is a far better bet for major and rapid shift to low carbon than concentrating almost exclusively on EV. Just as one evidence-based example... https://theconversation.com/cycling-is-ten-times-more-important-than-electric-cars-for-reaching-net-zero-cities-157163.</p> <p>(17) Invest in Strategic Road Asset. We strongly support adequate investment in maintenance - though we could take it more seriously if the government provided much more assistance for maintenance of the poor relation, local authority roads and potholes. We also recognise the case for an A83 project, given that it appears that maintenance alone cannot solve the problems here - problems growing by the year, thanks to the climate crisis. However we are very concerned by other wording in this intervention, such as "asset enhancement". The careful wording of this intervention could be taken to justify projects to increase road capacity, which would fly in the face of climate concern.</p>

R13 - Please use the space below to provide any other comments you wish to make on the STPR2: Update and Phase 1 Recommendations report.

We welcome the decision to split STPR2 into an immediate Phase 1 and longer-term proposals, due in part to the impacts and the uncertainty of the pandemic. In relation to this, intervention 7, in terms of making successful Spaces for People schemes permanent - and the need for government to be much more proactive on this - is paramount.

Secondly, we greatly regret the insufficiency of demand management proposals in Phase 1. As Chris Stark of the UKCCC told a Scottish Parliament Committee, the government is relying too exclusively on carrots alone. The incredibly ambitious and remarkable target to cut vehicle-km 20% by 2030 will never be met by the present overall approach, and if there is a major flaw in STPR2 Phase 1, that is it. As many experts have said, relying on long term targets (even as close as 2030) and not taking commensurate immediate actions is to deny the seriousness and the urgency of the climate crisis.

In particular we greatly regret that the government prevented the inclusion of large customer parking areas in the workplace parking levy proposals - even though these are merely options for councils to use when it fits local needs. Also that the workplace parking levy regulations are not yet in place.

Similarly, implementation of LEZs has been delayed substantially.

Finally, in terms of demand management, it is vital that rapid moves are made to some form of road user charging, given that fuel duty will rapidly decline with the shift away from fossil vehicles. Clearly this entails discussions with the UK government, but this needs urgency in view of the climate emergency and the need to prevent unsustainable habits building themselves in with the public becoming accustomed to minimal fuel costs.