

Cycling Framework for Active Travel – Impact Assessments Consultation

... Spokes **response**, December 2022

Framework and Delivery Plan Purpose

The [Cycling Framework for Active Travel](#) sets out our strategic priorities and shared actions to maximise cycling's contribution in realising the Scottish Government's long term [Vision for Active Travel in Scotland](#): That Scotland's communities are shaped around people, with walking and cycling the most popular choice for everyday short journeys.

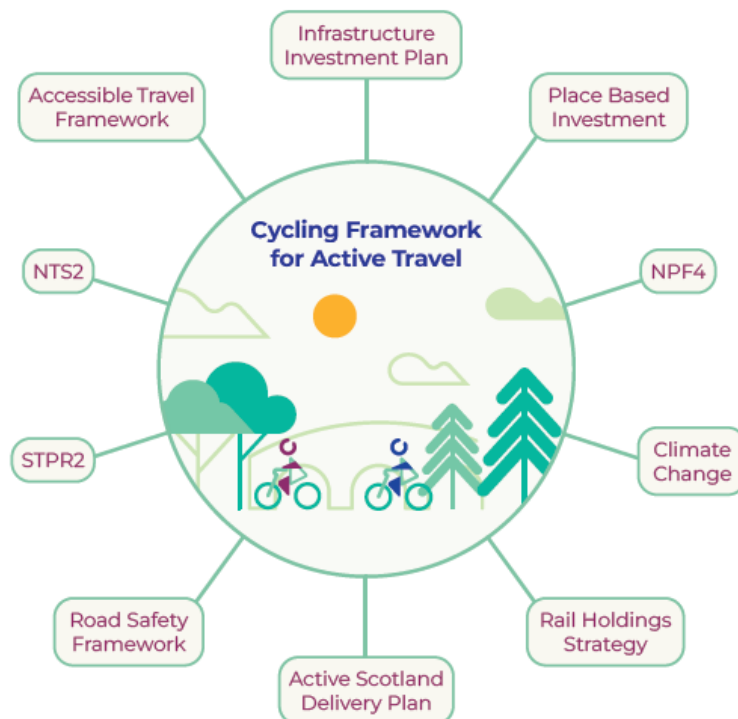
The top priority for the achievement of our vision is for the delivery of more dedicated, high quality, safe cycling infrastructure, effectively resourced, where fair access is ensured and uptake is supported with training and education.

1. Do you agree with the above statement of strategic priorities for driving the development of cycling for transport in Scotland?

Please select only one item

Yes

Comment: Whilst we strongly agree that high quality cycling infrastructure should be the top priority, it would be helpful to explicitly mention the sustainable transport hierarchy here as well.



2. The diagram above sets out how the Cycling Framework is aligned to the wider policy

context. Do you agree that this captures the key policy linkages and/or should any policy areas be added or removed?

Please select only one item

Yes

Comment: Should [Scottish Planning Policy](#) be included?

3. Six strategic themes have been identified based on stakeholder feedback. These are: Safe Cycling Infrastructure; Effective Resourcing; Fair Access; Training and Education; Network Planning; Monitoring. These themes illustrate the overarching approach for cycling for transport in Scotland. Do you agree with these strategic themes as priority areas for action in this framework?

Please select only one item

No

The 6 themes are of course important, but they are insufficient. There must also be determined efforts at **car use reduction by demand management measures**. Carrots alone, for example in the form of good cycling infrastructure, will not attract all potential bike trips, and therefore cycling will not be able to achieve its full potential in contributing to the government's commitment to a 20% car-km reduction.

In summary, car demand reduction is integral to achieving cycling's full potential and therefore should be a theme in this document.

The experience of the pandemic, when greatly reduced car levels resulted in a big cycle-use boost, including novices, the less-confident, and families, makes this link particularly clear.

The recent and devastating [UKCCC report](#) on Scotland's inadequate progress towards meeting its legally-binding targets also recognises this linkage, that reduced car demand results in more bike use: *"Scotland has a laudable aim to reduce car-kilometres by 20% compared to 2019 levels by 2030. **If achieved this would provide significant co-benefits to Scottish citizens through reduced congestion and air pollution, and increased cycling and walking.**"*

For this reason: *"Scotland needs a full strategy with plans to deter car use, to accompany current plans to encourage active travel and the use of public transport."* Clearly the CCC does not consider that Scotland's existing 'route map' to 20% car-km reduction deals adequately with the question of car demand (leaving it till 2025 to even consider if it is necessary).

Delivery Plan – Safe Cycling Infrastructure

4. Do you have any comments on the substance of the delivery plan actions in this section?

Comment:

Based on our experience in Lothian:

- (a) This statement in the document is crucial: *"we will remove barriers to the fast implementation of cycling infrastructure, including through changes to the TRO process, and support the use of temporary and trial schemes"*. Some projects in Edinburgh have experienced delays of literally years due to factors such as **antiquated TRO rules**; and **excessive levels of consultation** (3 or 4 for some schemes) rather than trial and modification. We have also seen the removal of the successful Spaces for People project on George IV Bridge, due to rules preventing an ETRO being used to cover the gap in time between the Covid-related TTRO and the TRO for a permanent project.
- (b) In addition to the antiquated TRO rules, Scotland's unique RSO requirement also creates unnecessary work and delay.
- (c) **Infrastructure can be introduced remarkably rapidly** - Covid resulted in Edinburgh Council installing some 40km of protected cycling routes on main roads in around one year; a previously unimaginable achievement.
- (d) The importance of a **connected network** cannot be overstated. One difficult section in an otherwise excellent route will deter some people from using the route at all by bike. This can lead to difficult decisions for a council - e.g. where road width is limited and there is a need for both bus lanes and cycle lanes - however where connectedness is crucial, the cycle link should have a high priority - as in the sustainable transport hierarchy; and local authorities should be reminded of this. Whilst shared bus lanes are certainly better than nothing, they are not sufficient to attract the less confident, children, etc.
- (e) A ban on parking in cycle lanes and cycleways should be implemented; enforcement should be devolved to local authorities in the same way as pavement parking will be.

- (f) Additional resourcing from Transport Scotland to ensure that safe cycling networks extend across local authority boundaries. Too often, cross boundary routes are ignored, delayed or scrapped altogether due to local authorities being unable or unwilling to work together.
- (g) It is particularly important to ensure that **new developments** include high quality cycling infrastructure, and also connect to pre-existing active travel networks. Almost all of the recent green belt developments in and around Edinburgh have prioritised private cars over sustainable modes of transport. For example:
 - (i) They do not connect to existing neighbouring developments.
 - (ii) They do not include cycle parking.
 - (iii) They lack dropped kerbs and tactile paving.
 - (iv) Their transport assessments use a “predict and provide” method, allowing developers to design and build new developments matching the existing modal shares of the surrounding area, without any thought given to whether that is sustainable.
 - (v) Even when included, active travel connections in a development are often built last, several years after the first houses are occupied. The roads, of course, are built first - allowing non-sustainable travel habits to become embedded.
 - (vi) Local authorities have few resources for enforcing breaches of planning permission, meaning that developers often get away with cutting corners, and lower quality (and less used) active travel infrastructure is the result.
 - (vii) Section 75 funding rules should be broadened to allow local authorities to require s75 payments in order to upgrade existing infrastructure - such as widening pavements to meet design guidance.

Providing local authorities with the resources and processes to prevent and rectify these issues is important.

5. Do you have any comments on the agencies identified to lead and support these actions?

6. Do you have any other comments on this section of the delivery plan?

The Road Safety Framework contains a commitment to develop a National Dashcam Safety Portal (NDSP). There have been recent media reports that Police Scotland want to scrap this. The Cycling Framework for Active Travel would be a good opportunity to reiterate the Scottish Government's commitment to developing the NDSP.

Delivery Plan – Effective Resourcing

7. Do you have any comments on the substance of the delivery plan actions in this section?

We have greatly welcomed the commitment to 10% of the transport budget (or £320m) going to active travel. However, this has not been implemented in equal stages over the life of this Parliament, having risen from around 3% to only 4.3% in 22/23, and to 5.3% in 23/24 in the December 2022 budget announcement. This means there will have to be a very large splurge of funding in the final year. We are seriously concerned that the government and councils have not yet built up the levels of staffing and expertise needed to use these resources effectively. Doing so should now be an immediate priority.

8. Do you have any comments on the agencies identified to lead and support these actions?

9. Do you have any other comments on this section of the delivery plan?

Delivery Plan – Fair Access

10. Do you have any comments on the substance of the delivery plan actions in this section?

Comment: Despite generally supportive officers and councillors, and recently-improved local and national guidance, we still see planning applications for blocks of flats in new developments being approved which do not come close to meeting the cycle parking standards for non-standard cycles (such as adaptive cycles and cargo trikes). Councillors (rightly) point out that if they rejected these applications, the developer would probably win on appeal - a problem which is for the Scottish Government to solve.

Local authorities are also still too keen to build off-road shared use paths instead of reallocating road space on main roads. Since off-road shared use paths are unlit, quiet and remote, male violence against women is more likely to occur on them. It is therefore imperative that safe cycling routes are provided on main roads, so that women can

11. Do you have any comments on the agencies identified to lead and support these actions?

12. Do you have any other comments on this section of the delivery plan?

Delivery Plan – Training and Education

13. Do you have any comments on the substance of the delivery plan actions in this section?

14. Do you have any comments on the agencies identified to lead and support these actions?

15. Do you have any other comments on this section of the delivery plan?

Delivery Plan – Network Planning

16. Do you have any comments on the substance of the delivery plan actions in this section?

Rapid implementation of the Scottish Government's 20mph policy for built up areas is important. Councils should also be allowed to implement lower speed limits (e.g., 10mph) where these would be helpful (e.g., around schools).

The Framework contains a proposal that "local authorities in Scotland will be required to produce active travel strategies for each local authority area, setting out plans to improve active travel networks and facilities to 2030". The Framework **must** contain additional proposals that these strategies are **worth implementing**, and that local authorities **actually implement them** (and enforcement measures, such as loss of (non-active travel) funding, if they don't).

17. Do you have any comments on the agencies identified to lead and support these actions?

18. Do you have any other comments on this section of the delivery plan?

Delivery Plan – Monitoring

19. Do you have any comments on the substance of the delivery plan actions in this section?

Monitoring and evaluation by Transport Scotland of local authorities' strategies, and their implementation, should also take place. Scotland doesn't need another round of Strategies which just sit on a shelf; it needs those actual active travel infrastructure.

The Active Travel Capability and Ambition scoring system recently implemented in England would be a good model to follow.

20. Do you have any comments on the agencies identified to lead and support these actions?

21. Do you have any other comments on this section of the delivery plan?

Active Travel Transformation Project

In the 'Bute House Agreement' between the Scottish National Party and the Scottish Green Party in 2021, it was agreed that at least £320m or 10% of the total transport budget will be allocated to Active Travel (AT) by 2024/25. There is consensus that existing AT delivery models will not be scalable, nor in many cases suitable to meet the ambition of this new budget.

An Active Travel Transformation Project (ATTP) has been set up to assess the current delivery model and inform and implement a new delivery model for the future of AT. The primary objective of the ATTP is to maximise the opportunities in AT delivery in the short-term (2022/23) and medium term (2023/24-2024/25), to deliver the most effective and efficient achievement of AT outcomes.

Working closely with AT delivery partners, the ATTP is being delivered in two phases. Phase one focuses on evaluation and evidence gathering. This phase aims to assess the existing active travel delivery model by identifying constraints and opportunities. Phase two will use this evidence to develop and prioritise proposals for changing the delivery model.

The ATTP will culminate in December 2022 with a report to the Minister for Active Travel which will provide evidenced proposals for holistic changes to AT delivery in Scotland.

As part of the ATTP we are considering different models of incentivisation, evaluation and monitoring for local authorities.

To what extent do you agree with the following statements:

22. For large infrastructure projects, conditions of funding should be delivery on agreed targets for: timescales, expenditure and meeting project objectives.

Please select only one item

Strongly Agree

23. In order to ensure maximum value for money and impact, active travel funding in the short term should be prioritised for those local authorities with the greatest capacity to deliver, with capacity building support offered to those with the least.

Neither Agree or Disagree

This is a tricky question. We agree that funding should generally be prioritised to where it is likely to be most effectively spent. However, there already exists a chasm between the ambitions and capacities of different local authorities, and it is not at all clear that pulling funding from the poorly performing authorities would help them to improve. Perhaps the "stick" needs to be "we will reduce funding for road projects in your area unless your active travel plans and projects are up to scratch."

24. Future funding for active travel infrastructure should include a mechanism for re-distributing investment from local authorities unable to deliver to agreed standards and timescales.

Please select only one item

Neither Agree or Disagree

Comment:

As above - there is a real risk of entrenching a two-tier system amongst local authorities, so this proposal would need to be very carefully handled. This would, of course, conflict with the Framework's own Fair Access theme.

We are aware of one local authority who turned down centralised funding for a major project, as they didn't want to build it to national standards. This has led to the project being indefinitely delayed. Whilst it is good that money wasn't wasted on a sub-standard project, this does also mean that the existing road layout, which is horrific for those walking, wheeling or cycling, is unlikely to be changed before 2030. In the meantime, Transport Scotland is spending tens of millions of pounds in the area on road projects. If these road projects were conditional on the local authority having good active travel policies and projects, then we might actually get somewhere.

Impact Assessments

As part of the development of this policy framework, and to comply with our statutory obligations, a number of impact assessments have been carried out. These impact assessments are currently in the draft - or pre-screening - stage and are available to read alongside the framework and delivery plan.

The impact assessments that have been carried out are: Social and Equalities Impact Assessment (SEQIA), Business Regulatory Impact Assessment (BRIA), and Island Communities Impact Assessment (ICIA).

In order to inform the next phase of the development of the framework and delivery plan we welcome your comments on the draft impact assessments.

25. Do you have any comments on the draft Social and Equalities Impact Assessment?

26. Do you have any comments on the draft Business Regulatory Impact Assessment?

27. Do you have any comments on the draft Island Communities Impact Assessment?

About you

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. We will regard your response as confidential, and we will treat it accordingly.

To find out how we handle your personal data, please see our [privacy policy](#). By clicking submit you agree to our privacy policy.

Are you responding as an individual or an organisation? (Required)

Organisation

What is your organisation? Spokes- the Lothian Cycle Campaign

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: (Required)

Please select only one item

Publish response only (without name)

Information for organisations only:

The option 'Publish response only (without name)' refers only to your name, not your organisation's name. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Transport Scotland teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Transport Scotland to contact you again in relation to this consultation exercise? (Required)

Please select only one item

Yes