

## **National Transport Strategy - draft for consultation**

### **Cycling Scotland submission October 2019**

#### **Question 1 – Is the Vision that is set out in the National Transport Strategy the right Vision for transport policy over the next 20 years?**

Yes

We welcome the vision set out in the National Transport Strategy. We welcome the inclusion of the Sustainable Transport Hierarchy and the focus to embed this in decision-making within the Strategy.

It is important that the transport system meets the needs of everyone who needs to use it, while at the same time addressing some of the major challenges facing society, such as climate change, poor(er) health and wellbeing outcomes, and issues of equality.

#### **Question 2a – Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?**

##### **Please explain your answer**

We broadly welcome the Priorities and Outcomes of the draft Strategy for Scotland's transport policy over the next 20 years. In particular, we welcome the stronger focus on active and more sustainable modes of transport within the Strategy through the promotion of the Sustainable Transport Hierarchy.

Along with partners (Cycling UK, Forth Environment Link, Living Streets, Paths for All, Ramblers Scotland, Sustrans Scotland and Transform Scotland) we are jointly supporting the following priorities:

- Take space from private vehicles to make more room for walking and segregated cycling
- End new road building and prioritise active and sustainable travel
- Deliver affordable and integrated public transport
- The requirement for developers to include active travel infrastructure in initial plans for all new housing, commercial and retail development
- Support for behaviour change programmes which encourage active and sustainable travel
- Improve access to bikes

In the 'Help our economy prosper' section, we note reference is made to 'sustained' economic growth. This should be replaced by 'sustainable' economic growth. Sustainable economic growth reads across the outcomes and indicators outlined in the draft Strategy and will help to deliver a range of positive outputs including reduced emissions and improving health and wellbeing. As part of this, the significant positive economic impacts from cycling, which are wide ranging, and include tourism, the manufacturing industry, and increased retail spend, should be emphasised. A recent study we commissioned found that

cycling is worth over £500 million per year to the Scottish economy.<sup>1</sup> This is a significant contribution and should be recognised. Reference is made to cycling and walking tourism later in the Strategy which is welcome but more explicit reference is required to recognise the extensive economic benefits of cycling.

One of the outcomes listed in the consultation Strategy document refers to making use of 'beneficial innovation' and technology to improve the transport system. While technology innovation is important and should be recognised, it should not be relied upon too heavily to achieve desired policy outcomes, as the pace of change and rate of uptake cannot be guaranteed. There are also safety concerns for vulnerable road users from electric and low emission vehicles as these vehicles are often silent/much quieter and so are more challenging for people cycling to hear on the road. Such vehicles also still represent vehicular traffic on the roads and issues of congestion and air quality, from particulate matter emissions from braking and tyre wear, remain. The focus should instead be on promoting delivery of the Sustainable Travel Hierarchy and prioritising active travel (and other sustainable modes).

We welcome reference to the positive benefits of cycling and walking in the 'Improves our health and wellbeing' priority in the draft Strategy. Safety and security are also mentioned, and this is welcome; however, this outcome requires more action, particularly for vulnerable road users, in particular for people cycling, where rates of accidents and incidents where individuals are killed or seriously injured remain significant. The reported number of cyclists being seriously injured on Scotland's roads has increased from 138 in 2010 to 171 in 2017. Accidents and incidents on the roads for people cycling are a significant concern that needs to be addressed<sup>2</sup>. Perceptions of safety are also important and are a significant barrier to individuals participating in cycling (if they feel unsafe). We will discuss this further in question 3.

### **Question 2b – Are some of the Priorities and Outcomes more important than others or are they equally important?**

Promoting equality through increasing accessibility to active and sustainable modes, improving safety to remove barriers to participation, and reducing inequality, are important 'priorities and outcomes' for the Strategy. 'Takes climate action' and 'Improves our health and wellbeing' are also important priorities. More urgent action needs to be taken on these priorities in particular. While 'Helping our economy prosper' is an important priority, it has to be recognised that there is a shortage of academic evidence around whether new major transport schemes actually support economic growth.

### **Question 3 – Are the Challenges this Strategy highlights in Chapter 3 the key Challenges for transport, or are there other the Strategy should focus on?**

There are a number of challenges outlined in the draft Strategy which require further attention and should be prioritised in order to be overcome.

The 'Scotland's roads are getting safer' challenge states that Scotland has one of the safest road networks in the world. Despite the positive progress that has been made reducing road

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<sup>1</sup> Cycling Scotland (2017) The Value of Cycling to the Scottish Economy  
<https://www.cycling.scot/mediaLibrary/other/english/2548.pdf>

<sup>2</sup> Transport Scotland (2019) Key Reported Road Casualties 2018  
<https://www.transport.gov.scot/media/45015/sct05191903161.pdf>

casualties in the last 10 years, improving road safety of vulnerable road users, particularly people cycling, remains a challenge. Accidents and collisions with motorised vehicles, in particular cars, is the single biggest cause of injuries of all severities to people cycling. In 2018/19, 94% of people killed or seriously injured while cycling were involved in a collision with another vehicle. Safe, segregated, easy to access cycling infrastructure is therefore required to improve safety, and where it already exists, such infrastructure must also be maintained to a high standard. Research shows that segregated cycle lanes can reduce vehicle-bike accidents by as much as 30%<sup>3</sup>. The primary focus for investment going forward should be on enabling cycling through changing the physical environment to make it easier for anyone, anywhere to cycle.

The draft Strategy identifies strong linkages between deprivation and low levels of car ownership. The present transport system, through continuing to prioritise road development, currently places an unequal burden on those in the most deprived communities, and there is a risk that growth in car ownership further isolates those without access to a car. Re-focusing on providing integrated and responsive active travel services and infrastructure instead building new roads is essential and will contribute significantly to reducing inequality in the transport system in Scotland. The Scottish Government should set a trajectory to end trunk road construction and invest 10% of the national transport budget, or over £30 per person, in active travel. Local authorities should allocate budget similarly. There should be a presumption in favour of walking and cycling infrastructure in any transport appraisal and the Strategic Transport Projects Review 2 should primarily deliver improvements to active travel and public transport.

Linked to this, decades of planning have promoted car-use. Out-of-town developments with poor or non-existent public or active travel infrastructure have led to places dominated by cars. Several measures are needed to reverse this trend. All developers must be required to include active travel infrastructure in initial plans and not as an afterthought. Scottish planning policy should become statutory and ensure, alongside forthcoming National Planning Framework 4, that walking and cycling are the priority modes of travel for all new housing, commercial and retail development. Local authorities should be provided with tools and powers to manage travel and vehicle parking demand.

There should be greater recognition of the regional differences between rural and urban areas in Scotland and the impact this has on travel behaviour decisions. There is a need to build and maintain dedicated cycling infrastructure, enabling people aged 8 to 80 to cycle on coherent cycle networks in cities and towns. This entails cohesive, comprehensive and seamless networks of on-road segregated paths in cities and, where appropriate, alongside trunk roads and busier local roads in rural areas. In the urban setting such networks will link into and incorporate existing off-road networks where they deliver direct and high-quality routes. 'Success' should not only be measured in terms of additional kilometres of network but have a qualitative aspect, including following good practice and inclusive design standards, numbers of segregated cycle lanes, and integration with public transport.

Scotland continues to face a significant challenge in terms of vehicle greenhouse gas emissions and there is a clear need to address these both as a significant contributor to climate change and as a public health issue. As acknowledged in the draft Strategy, transport is now the single largest source of greenhouse gas emissions in Scotland, accounting for 37% of emissions in 2017. Of this, cars are the largest individual source,

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<sup>3</sup> Designed to Move: Active Cities report <http://e13c7a4144957cea5013-f2f5ab26d5e83af3ea377013dd602911.r77.cf5.rackcdn.com/resources/pdf/en/active-cities-full-report.pdf>

accounting for 40% of these emissions. Car remains the dominant mode, with the largest proportion of journeys being short, single occupancy journeys. Action in this area needs to be prioritised to shift these short car journeys to more active modes. More than 60% of car journeys are under five kilometres, and it is these journeys that offer the greatest potential to switch to cycling<sup>4</sup>. Short motor vehicle journeys also make a disproportionate contribution to overall air pollution levels<sup>5</sup>. Cycling is a viable and cost-effective way to reduce carbon and other emissions, as a zero-carbon option, to help move Scotland towards a carbon-neutral economy, and offers a wide range of environmental and health benefits including noise reduction, less air pollution and emissions, reduced congestion and noise pollution, increasing attractiveness of places, and providing more space in the environment. Research highlights that shifting 10% of journeys from car to bike would reduce air pollution and save 400 productive life years<sup>6</sup>.

Technological advances: as previously discussed, while technological advances with regards to transport are important, the transport sector should not rely too heavily on fuel efficiency and other technology improvements. Indeed, electric and other low emission vehicles still contribute to particulate matter emissions, through braking and tyre wear. This has implications with regards to the focus on electric vehicles within the draft Strategy, as they still represent traffic and such issues would remain even with these vehicles generating less exhaust emissions. Recent research commissioned by Transport Scotland on greenhouse gas emissions reduction potential for Scotland shows that, although light vehicles (cars, vans and motorcycles) deliver the highest emissions reduction potential both in absolute terms and as a proportion of current emissions, increases in demand for such vehicles are likely to offset the emissions reduction impact of energy efficiency and technology improvements in these vehicles<sup>7</sup>. Policy should instead be focused on reducing the need for travel and replacing vehicle journeys with active and sustainable modes for short journeys, promoting modal integration between these modes, to deliver truly sustainable door-to-door journeys.

Of significant concern are autonomous vehicles, as they pose a significant potential safety risk to vulnerable road users, including people cycling. Autonomous vehicle technology is not yet advanced enough to be operated safely, and there is insufficient evidence to prove that fully autonomous vehicles can ever operate safely on all roads in Scotland. Further, autonomous vehicles still represent vehicles on the road and so do nothing to address the aforementioned inherent issues of vehicular traffic.

Health and wellbeing outcomes: Rising levels of physical inactivity are a significant cost to society. Physical inactivity is estimated to cost the NHS in Scotland £94.1 million annually (equivalent of £18 per head of the population per year)<sup>8</sup>, with the burden of disease caused by this physical inactivity more readily experienced in deprived populations. Cycling is not

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<sup>4</sup> Cycling Scotland (2018) Annual Cycling Monitoring Report  
<https://www.cycling.scot/mediaLibrary/other/english/3028.pdf>

<sup>5</sup> Murie, J (2017) Active travel in Glasgow: what we've learned so far. A Glasgow Centre for Population Health (GCPH) report  
[http://www.gcph.co.uk/assets/0000/6007/Active\\_travel\\_synthesis\\_final.pdf](http://www.gcph.co.uk/assets/0000/6007/Active_travel_synthesis_final.pdf), page 10

<sup>6</sup> British Cycling (2014) Benefits of Investing in Cycling  
[https://www.britishcycling.org.uk/zuvvi/media/bc\\_files/campaigning/BENEFITS\\_OF\\_INVESTING\\_IN\\_CYCLING\\_DIGI\\_FINAL.pdf](https://www.britishcycling.org.uk/zuvvi/media/bc_files/campaigning/BENEFITS_OF_INVESTING_IN_CYCLING_DIGI_FINAL.pdf), page 2

<sup>7</sup> Element Energy on behalf of Transport Scotland (2017) Greenhouse Gas Emissions Reduction Potential in the Scottish Transport Sector from Recent Advances in Transport Fuels and Fuel Technologies <http://www.transport.gov.scot/system/files/documents/reports/j202258.pdf>, pages 35 & 36

<sup>8</sup> <http://www.healthscotland.com/uploads/documents/20437-D1physicalinactivityscotland12final.pdf>

only a highly effective and efficient way to increase rates of physical activity, it also helps to reduce the risk of many lifestyle diseases including cancer, stroke and heart disease, and helps to improve overall quality of life. Cycling and active travel should be emphasised as an essential element of the transport system, to further align with public health objectives and a joined-up, cross-portfolio evidence base for policy decision making. We welcome recognition within the draft Strategy that walking and cycling infrastructure must be maintained to encourage use, and that road condition is vital for people cycling. Where infrastructure exists it must be maintained, and where it doesn't exist, suitable road conditions are vital to facilitate cycling. However, in this regard, a key challenge missing from the Strategy is ensuring that active travel infrastructure is designed in a holistic way that is accessible to everyone.

One area missing from the strategy is road maintenance on local roads. Local roads are the roads predominantly used by people cycling for everyday journeys and the decline in road conditions will inevitably make it more challenging for people cycling.

Local roads in poor condition can be challenging and dangerous for people cycling. People cycling are disproportionately affected by potholes, rutting, gaps around ironwork, loose or missing manhole covers, drains and other surface defects. The deterioration of the local roads network can therefore have significant negative impacts for people cycling and for other vulnerable road users. Such factors with regards to road maintenance should be considered/included within the draft Strategy and the £1.8 billion plus backlog in road maintenance should be taken into account in making funding decisions about major new road building proposals

Another key challenge is the increasing use of and reliance on the car as a means of getting to work and for travel for everyday short journeys, which is both influenced by and influences transport investment decisions. Although increasing, the proportion of journeys by bike to work and school remains low. Recently published data shows that the vast majority of people travel to work and for everyday journeys by car, with more than two-thirds doing so, with the majority of these car journeys short journeys. This is in contrast to only 2.8% of people cycling to work<sup>9</sup>. Only 35% of households in Scotland had access to a bike in 2018, with the lowest levels amongst those on low incomes. This can mean people on low incomes have no option other than potentially unaffordable car ownership or increasingly expensive public transport, denying people the benefits of healthy travel. The transport system needs to refocus away from new road building and motorised transport to deliver on and embed the Sustainable Transport Hierarchy in policy decision making. Funding should support public bike share to address transport poverty, as well as cycle training, safe bike storage and zero-interest loans to support access to bikes and adapted cycles. Affordable cycling for all communities will open up opportunities for social activity, education, employment and healthy active lives. This has profound implications for delivering on a range of policy goals and achieving outcomes across a range of policy areas, not just transport.

A key priority for the transport system is encouraging and promoting behaviour change as behaviour change programmes can help maximise the impact of investment in infrastructure.

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<sup>9</sup> Transport Scotland (2019) Transport and Travel in Scotland: Results from the Scottish Household Survey <https://www.transport.gov.scot/media/45466/tatis-2018.pdf>

**Question 4a – Through the process to develop the National Transport Strategy, 14 policies have been identified that will deliver its Vision and Outcomes and address the Challenges. Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?**

While there is a recognition of the importance of active travel within the draft Strategy as a whole and reference made to it in the enablers of the policies listed, none of the fourteen policies listed explicitly reference active travel. This is a clear gap given the draft Strategy's focus on implementing the Sustainable Transport Hierarchy and action to make the transport system more sustainable, inclusive and accessible.

The policies listed should include explicit reference to providing a transport system that makes cycling and walking the easiest and most natural choice for short everyday journeys, and remove barriers of access to active travel, to enable anyone anywhere to cycle (or travel actively), facilitating a long-term modal shift to active travel. One of the fourteen policies listed refers to travel choices which help to improve people's health and wellbeing; this is welcome but there should also be included explicit reference to active travel for the reasons already outlined, as a key policy focus.

**Question 5a – Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional level (e.g. by Regional Transport Partnerships), or at a local level (e.g. by local authorities)?**

**Please explain your answer, by providing examples of where you believe transport related decisions should be made.**

Local authorities should be in charge of decisions regarding local roads, including decisions on road maintenance and local road infrastructure. This includes maintenance of on-road cycle lanes. A significant proportion of the National Cycle Network (NCN) is located on local roads, and local roads are the roads used predominantly by people cycling for everyday journeys. It is therefore important that the needs of vulnerable road users, including people cycling, are taken into account in decision-making processes for local roads.

**Question 5b – Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?**

**Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.**

It is important that local communities are engaged in decision making regarding transport in their local area. This is especially important to ensure that it meets the needs of different residents. This could be achieved through community consultations, charettes, focus groups and face-to-face meetings. A representative of a community council group, for example, could also attend meetings where transport decisions are discussed. Examples of the types of decisions communities could be involved in include decisions on facilities on a shared use path or the location of new cycle parking within the local area.

### **Question 7a – What aspects of the transport system work well at the moment?**

Areas of the transport system which work well at the moment include – the existing NCN network; segregated cycle lanes; and other active travel-focused infrastructure. The doubling of funding for active travel to £80 million is also welcome.

### **Question 8a – What aspects of the transport system do not work well at the moment?**

Despite large increases in funding for active travel and sustainable transport, which is welcome, there remains continued prioritisation of cars/road transport in the transport system. There should be a change in the current focus on cars (and other motorised vehicles) as the default option and instead focus on cycling and active travel as a real and positive alternative, particularly for short journeys to deliver on the Sustainable Transport Hierarchy emphasised in the draft Strategy.

An increased focus on cycling (and active travel) is a critical driver of the National Performance Framework and for delivering on several indicators outlined in the Framework, including to reduce traffic congestion, reduce Scotland's carbon footprint, increase the proportion of journeys to work made by public or active transport, and improve access to local greenspace<sup>10</sup>. This also aligns to commitments outlined in the recently published Programme for Government<sup>11</sup>; the recent independent review of the Cleaner Air for Scotland Strategy, which calls for a shift to more sustainable modes of transport<sup>12</sup> to improve air quality in Scotland; and to the climate emergency declared by the Scottish Government.

There are also problems with a lack of proper integration of active travel with public transport, which is essential for promoting and encouraging truly sustainable door-to-door journeys. Where cycle space does exist on public transport, this is often insufficient and there is inconsistency with how bike users are dealt with, especially on trains. Government should prioritise reversing the decline in bus patronage and promote integrated transport options. Public transport has positive impacts on the whole transport system. It takes vehicles off the road, reducing congestion, and can make it easier to remove space from vehicles for wider pavements and cycling infrastructure. Public transport use is always multimodal. Multimodal transport hubs should incorporate walking and cycling infrastructure, public transport infrastructure and car clubs. Sheltered bus stops and real-time information should be provided, as well as protected and secure cycle parking, especially at public transport interchange and at rural bus stops.

Road maintenance is also a concern, with the needs of people travelling actively not properly accounted for. Further, coupled with poor linkage of cycle lanes, where routes are not continuous and end abruptly, makes it extremely challenging for an individual to complete an end to end journey safely on a bike. This needs to be addressed. Road maintenance and other road works is an area of increasing concern for the safety and ease of journey for people cycling and needs to be given proper consideration with the Strategy.

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<sup>10</sup> Scottish Government (2016) The National Performance Framework  
<http://www.gov.scot/Resource/0049/00497339.pdf>

<sup>11</sup> Scottish Government (2019) Programme for Government: the Government's Programme for Scotland 2019-2020 <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>

<sup>12</sup> Scottish Government (2019) Cleaner Air for Scotland – An Independent Review  
<https://www.gov.scot/publications/cleaner-air-scotland-strategy-independent-review/pages/15/>

### **Question 8b – What practical actions would like to see the National Transport Strategy take to improve these?**

A number of actions could be taken. These include:

- Focused policies to deliver the Sustainable Transport Hierarchy
- Promotion of active travel as default option for short, everyday journeys
- Safe, segregated, easy to access cycling infrastructure (and active travel routes)
- Greater emphasis on behaviour change towards active travel
- Improve accessibility and reduce inequality in terms of access and outcomes experienced from the transport system
- Road maintenance (spending) decisions on local roads take account of and prioritise the needs to vulnerable road users
- Set a trajectory to end trunk road construction and invest 10% of the transport budget (over £30 per person per year) on active travel
- Increased cycle storage on public transport (trains and buses) to support modal integration
- Traffic calming measures, particularly in known speed hotspots, through targeted reduction of speed limits, including 20mph zones
- Focus on promoting multi-modal journeys to deliver truly sustainable end-to-end journeys
- Scottish Planning Policy to become statutory with increased focus on planning decisions ensuring walking and cycling are realistic for all new housing, commercial and retail developments.
- Managing freight and HGV access in town centres, including through last-mile deliveries, to increase safety for vulnerable road users.

These actions will help encourage modal shift to cycling and active travel and help deliver on objectives to embed the Sustainable Transport Hierarchy within transport policy decisions.

### **Question 9 – Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything else you would like to say about these actions?**

We welcome that the Sustainable Transport Hierarchy will be embedded in the Managing Demand key area and that it will be used to inform budgetary decisions. This will help contribute towards spending decisions being made in favour of active travel which is welcome. Within this, we also welcome reference to the provision to introduce legislation for the Workplace Parking Levy (WPL) as part of the Transport (Scotland) Bill. The Levy is an equitable policy across the whole population as money raised can be used to fund transport improvements for the whole population and is a more equitable way of funding active travel and public transport than other forms of taxation. Further, people living in lower-income communities are disproportionately affected by the health impacts from air pollution and are more likely to be killed or seriously injured by cars. Specifically, in Scotland, a third of households do not have access to a car, meaning they are negatively impacted by prioritisation of cars at workplaces and in other public spaces. We believe a parking levy for out-of-town retail parking should be consulted on, as a potential power to manage travel demand.



**Question 10 – Is there anything else you would like to say about the National Transport Strategy?**

In the Strategy there should be explicit reference to and linkage with other strategies and action plans including a revised Cycling Action Plan for Scotland<sup>13</sup>, National Walking Strategy<sup>14</sup>, Long-term Vision for Active Travel<sup>15</sup>, Active Scotland Outcomes Framework<sup>16</sup>, and the newly published Active Travel Framework to ensure policy coherence and emphasis on active travel in all (relevant) policy areas and decisions.

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<sup>13</sup> <https://www.transport.gov.scot/media/10311/transport-scotland-policy-cycling-action-plan-for-scotland-january-2017.pdf>

<sup>14</sup> <https://www.be-actived.co.uk/assets/Scotland-Walking.pdf>

<sup>15</sup> <https://www.transport.gov.scot/media/33649/long-term-vision-for-active-travel-in-scotland-2030.pdf>

<sup>16</sup> <https://www2.gov.scot/About/Performance/scotPerforms/partnerstories/Outcomes-Framework>