

## SPT Regional Transport Strategy Case for Change Consultation

### Cycling Scotland submission June 2021

Question 7 – The proposed vision for the new Regional Transport Strategy is:  
“The west of Scotland will be an attractive, well-connected place with active, liveable communities and accessible, vibrant centres facilitated by a high quality, sustainable transport system shaped by the needs of all”

Do you agree or disagree that this should be the vision for the new RTS?

- Strongly agree

Question 8 – Please provide any further comments on the RTS vision?

The proposed vision is welcome and addresses many of the issues faced by the region.

Question 9 - RTS Targets

Three targets (in principle) are proposed for the new RTS:

Target 1: A reduction in roads transport emissions

Target 2: A reduction in car kilometres by 2030

Target 3: A ‘modal shift’ from private passenger car to more sustainable modes and methods

Do you agree or disagree that these should be the targets for the new RTS?

- Agree

Question 10 – Please provide any further comments on the RTS targets

The proposed targets outlined are welcome. It would be welcome to see numbered targets included in the RTS. For example, target 2 could be amended to say a 20% reduction in car kilometres to align with the national Scottish Government target set out in the updated Climate Change Plan. Having numerical targets makes it easier to measure and track progress over time.

In addition to encouraging modal shift to more sustainable modes, there should be a focus on reducing the need to travel in the first place. The greenest mile is the mile not travelled and this should be acknowledged and promoted. This is recognised in national policy documents, such as the Cleaner Air for Scotland 2 Strategy, and should be more widely recognised in the RTS. This will help to prevent greenhouse gas emissions and car kilometres from occurring in the first place, rather than being solely focused on reduction of these and dealing with them after they have occurred.

Question 11 – Do you think any other targets should be considered for the new RTS?

- Yes

Question 12 – What other targets should be considered and why?

Active travel should be explicitly referenced in the targets. The reference in target 3 to modal shift to more sustainable modes is welcome, however, this should be amended to include explicit reference to active modes. Reference to active travel aligns with the Sustainable Transport Hierarchy and would ensure a focus on active travel in this regard.

The Covid-19 pandemic has led to fundamental changes in travel patterns and behaviours. The importance of sustainable travel and the possibilities around reducing travel have been highlighted. Positively, there was a significant increase in the number of people cycling in 2020/21; however, there has also been a massive decrease in the number of people using public transport, which has an important role to play in decarbonising transport and delivering the sustainable transport hierarchy. As we move forward in the transition from the pandemic, it is important that the gains in improved air quality, emissions reductions, and increased levels of cycling are not being reversed by a return to pre-pandemic or even higher levels of motorised transport. Ensuring a green and just recovery from the pandemic in this regard should be included as a target in the RTS.

Question 13 – Transport emissions is a ‘key issue’ for the RTS. How important is this issue for you or your organisation?

- High

Question 14 – Please provide any comments on the Transport Emissions Key Issue

As acknowledged in the consultation document, emissions from transport are the largest contributor to greenhouse gas emissions both in Scotland and in the SPT region. Road transport is the largest contributor to emissions from transport, with the private car being the biggest contributor to road emissions.

We note the RTS details cleaner vehicles, including ultra-low emission vehicles. Whilst such vehicles have a role to play in helping to decarbonise transport, 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. Such vehicles still represent vehicular traffic on the roads and issues of congestion and emissions, from very harmful particulate matter emissions from braking and tyre wear, remain. The biggest barrier to cycling is concern about traffic on the road, and so a large number of these vehicles, in place of conventional petrol or diesel vehicles, on the road may discourage people from cycling, which could undermine the achievement of emission reduction targets and broader climate change objectives. Further, there are additional safety concerns for vulnerable road users, like people cycling, as these vehicles are often silent/much quieter at low speeds and so are more challenging for people cycling to hear on the road. The focus should be on reducing the number of private cars on the road and the amount of private vehicle kilometres, promoting delivery of the sustainable transport hierarchy, and prioritising active travel (and other sustainable modes).

We note the growth of LGVs and last mile deliveries is mentioned. Nationally, there has been a 93% increase in greenhouse gas emissions from LGVs between 1990 and 2018<sup>1</sup>, the largest percentage increase of all transport modes. Indeed, across the region, as highlighted in the document, the number of LGVs has increased by 18% between 2009 and 2019, and in 2019, 98% of all LGVs in the region were diesel vehicles. The figures detailed in the consultation document are pre-pandemic, so the growth in such vehicles in the region is likely to be even greater, if the period of the pandemic is taken into account. This is an issue of significant concern and highlights that much remains to be done to cut emissions from the

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<sup>1</sup> Scottish Government: Carbon Account for Transport No. 12: 2020 Edition

transport sector. In this regard, a significant omission from the RTS is cargo and e-cargo bikes. Cargo and e-cargo bikes, where utilised for first and last mile deliveries, have an important role to play in reducing greenhouse emissions from transport and improving air quality, as they can help to reduce the number of freight and delivery vehicles on the road, which as outlined earlier, are the transport mode which has seen the largest increase in emissions.

We welcome that the link between transport use and land use planning has been acknowledged and outlined in the document. Further, we welcome reference to applying the concept of 20-minute neighbourhoods. It is important in the application of the concept that differences between neighbourhoods in rural and urban areas/neighbourhoods across the region are recognised and that a one-size-fits-all approach may not be workable.

Land-use planning has a key role to play in facilitating the necessary shift away from cars. It is important that spatial planning and placemaking policies incorporate consideration as to how cycling and walking can be integral to planning decisions to address emissions from transport. Developments which give precedence to cycling and active travel, and connections to public transport, are essential, and should be prioritised. Separated dedicated cycle lanes which separate people cycling from traffic should be prioritised in towns and cities, in this regard. Further, development should be directed to re-use or re-development of brownfield land and there must be a firm presumption against greenfield site development. This principle should be further extended to commercial and other sites, with a focus to ensure developments have good linkages to existing active travel networks and public transport interchanges. Where new developments are being planned, primary consideration should be given to making connections to these linkages. Where linkages to infrastructure do not exist or are not able to be delivered, the decision to permit development in a particular area should be reconsidered accordingly.

Question 15 – Access for All is a ‘Key Issue’ for the RTS. How important is this issue for you or your organisation?

- High

Question 16 - Please provide any comments on the Access for All Key Issue

Access to active and sustainable modes of transport is crucial to help reduce greenhouse gas emissions, improve air quality, improve road safety, and address inequality across the region. We note the document highlights that forced car ownership is a growing issue for urban households across the region. The present transport system, including 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 active travel infrastructure, including connected networks of safe and easily accessible separated and dedicated cycle lanes, instead of expanding new road capacity is essential in this regard. Increasing access to bikes and storage facilities is key to addressing inequality and reducing transport poverty and should be prioritised across the region.

As acknowledged in the document, traffic volumes and speed of traffic on the roads are key concerns for vulnerable road users and are key factors for choosing not to cycle or travel actively. In this regard, the focus needs to be on activities which reduce the speed and number of vehicles on the road. A significant omission from strategy in this regard is 20 mph and other speed restrictions. We would like to see the introduction (or expansion where it already exists) of 20 mph speed limits on urban residential roads across the region, many of which are currently likely to have speed limits of 30mph, and which are the roads used most

regularly by people cycling. There should also be support for local roads authorities in the region to review and lower speed limits on faster roads from 60 and 50mph, improving the safety for road users and reducing climate change emissions

For those living in more rural areas in the region, accessibility is not only comprised by distance but also, in many cases, by roads which are not suitable for cycling i.e., that are too narrow and on which traffic travels too fast. This can create increased car dependency, even for short everyday journeys and alternative routes should be provided for those living in rural and semi-rural areas in the region in this regard.

We note that the RTS document highlights the high-cost public transport across the region. This can be a barrier to accessing public transport for many people and for creating truly sustainable door-to-door journeys.

Question 17 - Regional Connectivity is a 'Key Issue' for the RTS. How important is this issue to you or your organisation?

- High

Question 18 - Please provide any comments on the Regional Connectivity Key Issue

It is welcome that ensuring connectivity both across and between the region and the rest of the country (and beyond) is included as a key issue.

We note reference to the impact of the Covid-19 pandemic on travel modes, patterns, and trends in this section. The Covid-19 pandemic has led to fundamental changes in travel patterns and behaviours, in both positive and negative ways. The importance of sustainable travel and the possibilities around reducing travel have been highlighted. One of the positive outcomes of the pandemic has been an increase in rates of cycling (and walking) across the country. Compared to 2019, rates of cycling from March 2020 to March 2021 were much higher and increased by more than 100% in some areas<sup>2</sup>. This presents an important opportunity to capitalise on and embed these positive changes over the medium to longer-term.

One of the key challenges arising from the Covid-19 pandemic is the significant and pronounced decline in public transport use, and growing levels of car and other motorised transport use. Since the first easing of lockdown restrictions in summer 2020, levels of motorised traffic have returned to near pre-pandemic levels and in some cases have exceeded them; this has been accompanied by a massive decrease in the number of people using public transport. This is problematic, as public transport has an important role to play in decarbonising transport, reducing congestion, and improving regional connectivity. Going forward, as we emerge from the pandemic, further concerted action will be needed to address the decline in public transport, and to ensure there is not continued exponential growth in car/motorised transport use. Such action is essential to deliver a sustainable and resilient transport system across the region.

Question 19 - Active Living is a 'Key Issue' for the RTS. How important is this issue to you or your organisation?

- High

Question 20 - Please provide any comments on the Active Living Key Issue

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<sup>2</sup> <https://www.cycling.scot/news-and-blog/article/one-year-on-cycling-up-47-percent-in-scotland>

We welcome inclusion of active living as a key issue, in particular the focus on making walking, wheeling, and cycling the natural choice for everyday journeys. Cycling and active travel is well documented as positively benefitting health and wellbeing and improving quality of life.

We note in the consultation document that the lack of availability of separated cycle routes was the main reason identified by survey respondents as a key challenge for choosing to cycle (to work), with more dedicated and direct routes identified as key enablers of cycling. Given these findings, activity across the region should be focused on providing coherent networks of safe, easily accessible cycling infrastructure that is separated from traffic and other modes to get more people cycling regularly across the region.

With regards to integration with public transport, it is welcome that the consultation document acknowledges this is an area where improvement is required. Active travel has a key role to play alongside public transport to facilitate sustainable door-to-door journeys and for discouraging car use for short trips to and from public transport interchanges, for example. This includes the development of safe cycling and walking routes to bus hubs and train stations, as well as provision of secure bike parking at these key public transport hubs.

A significant issue for many areas across the region is managing parking and enforcement action against poor parking behaviour. Poorly parked vehicles, including vehicles parked on the pavement, can force pedestrians into the road and is unsafe for people cycling and other vulnerable road users. Vulnerable road users, especially those with visual impairments or who use wheelchairs as mobility aides, are greatly affected by poor parking and a lack of enforcement of poor parking behaviour, such as parking over dropped kerbs and pavement parking over access points.

We note and welcome that the workplace parking levy is listed in section 11 on the RTS options as a proposal for parking demand management. In this regard, we would like to see a commitment in the Strategy for the constituent local authorities to implement the workplace parking levy, as an effective and equitable policy for controlling parking and influencing travel behaviours in their respective areas.

Further, with regards to parking, we note the use of decriminalised parking enforcement (DPE) by local authorities across the region is not mentioned in the consultation document. This is an omission which should be addressed. DPE transfers the enforcement of all parking restrictions and waiting loading restrictions powers to a local authority, which includes the following waiting and parking restrictions: double yellow lines; single yellow lines; clearways; disabled bays; loading bays; bus bays; taxi ranks; permit holder bays (e.g., residents / doctors); and school keep-clear zig zags. We would like to see DPE powers rolled out to each local authority in the region, as a key mechanism for improving parking enforcement and improving safety and experience on the roads for vulnerable road users.

Parking control is one of the most effective measures available to a local authority in controlling traffic movement through the area. The cost of parking and parking supply are tools that can be used to manage parking demand within an area and promote alternative travel choices to the private car. By controlling the number of parking spaces and the way in which these spaces are utilised, the number and purpose of journeys into a particular area can be directly influenced. This is only successful if there is regular parking enforcement, which DPE powers would bring to the constituent local authority areas. DPE also helps to improve road safety while at the same time encouraging increased use of more sustainable and healthier forms of transport, like cycling.

Question 21 - Public Transport Quality & Integration is a 'Key Issue' for the RTS. How important is this issue to you or your organisation?

- High

Question 22 - Please provide any comments on the Public Transport Quality and Integration Key Issue

It is welcome that public transport integration is included as a key issue in the consultation document. As previously mentioned, integrating public transport with active modes, like cycling, walking, and wheeling, is required to deliver sustainable door-to-door journeys and to disincentivise car use for short journeys.

A number of issues are listed in the consultation document as key issues in this regard including cost of public transport compared to driving, value for money and integrated ticketing. These issues need to be addressed to ensure the benefits of integrated public transport with active modes can be fully realised. Public transport has positive impacts on the whole transport system. It takes vehicles off the roads, reduces congestion, and can make it easier to remove space from vehicles for wider pavements and cycling infrastructure.

Question 23 - Do you believe there are any other 'Key Issues' that should be considered for the new RTS?

- Yes

Question 24 – Please add any other key issues

Ensuring a just, green, and sustainable recovery from Covid-19 should be considered as a key issue.

Question 25 – Five RTS Objectives have been developed in response to the Key Issues:

To reduce transport emissions in the region

To improve equality of access to the transport system and improve accessibility to town centres, jobs, tertiary education and hospitals and other opportunities

To improve connections between regional centres of economic activity & development opportunities within the region, and to key domestic and international markets

To enable walking, cycling and wheeling to be the most popular choice for short, every day journeys

To make public transport a desirable travel choice for residents and visitors

Do you agree or disagree that these should be the objectives for the new RTS?

- Agree

Question 26 - Please provide any further comments on the RTS objectives

We agree with and welcome the 5 RTS objectives detailed above.

Alongside measure to enable walking, cycling, and wheeling as the most popular mode for short, everyday journeys, and improving the desirability of public transport, measures to

reduce demand for cars need to be prioritised and should be included as one of the objectives of the RTS.

Question 27 - A long list of options is set out within section 11 of the Case for Change Report.

Do you think that there are any options that should be considered for the new RTS that haven't been included in the report?

- Yes

Question 28 – What additional options should be considered and why?

We note Workplace Parking Levy (WPL) is mentioned in the demand management sub-section of Section 11 of the document on page 67, as a proposed demand management measure. Option 50 on the long list of options mentions parking as a demand management option but does not include the WPL. This is a significant omission from the long list. Option 50 should be updated to include specific reference to the WPL or the WPL added as a new option on the long list.

Additionally, in the demand management actions on the long list, there is currently no specific reference to measures to reduce demand for cars. This should be included, as per our comments in answer to question 26.

Action 73 on the long list on movement of goods, outlines options for last-mile deliveries. We note there is no reference to e-cargo and cargo bikes in this action. This is a significant omission and believe the action should be updated to include reference to e-cargo and cargo bikes, to acknowledge the important role they can play in decarbonising local deliveries, reducing congestion and improving air quality across the region.

In the road actions section on the long list, an action outlining a commitment to no new road building and limiting investment in expanding road capacity should be included. This aligns with the recommendation of the Scottish Infrastructure Commission which states there should be a presumption in favour of future proofing existing road capacity<sup>3</sup>.

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<sup>3</sup> Infrastructure Commission for Scotland (2020) Phase 1: Key findings report. A blueprint for Scotland [https://infrastructurecommission.scot/storage/238/ExecutiveSummary\\_160120.pdf](https://infrastructurecommission.scot/storage/238/ExecutiveSummary_160120.pdf)