STPR2 Phase 1 consultation

Cycling Scotland submission
March 2021

Case for Change

Question 1 – To what extent do you agree or disagree with the following statement: The recommended transport options in STPR2 are strategic covering a range of modes and geographies
- Agree

Question 2 – How well do you feel the transport options recommended for further consideration address the problems, opportunities, and objectives for strategic transport connections in Scotland?
- Well

Question 3 – Do you have any other comments on the options identified?

The overwhelming challenges presented by the climate emergency need to be the top priority for STPR2 decisions.

Ensuring a green recovery after Covid-19 is a key commitment of the Scottish Government[1], and budgetary decisions need to support this. Decisions which support the delivery of the sustainable transport and investment hierarchies are required in this regard. It is essential that it is also a socially just recovery as part of a Just Transition to net zero. The provision of greater access to bikes is a key element in a just transition.

Question 4 – To what extent do you agree or disagree with the following statement: It is clear what the next steps are when considering the transport options through STPR2?
- Agree

Question 5 – Do you believe the Covid-19 pandemic will bring about challenges and/or opportunities relevant to planning future transport investment through SPTR2?
Please select all that apply
- Yes, challenges
- Yes, opportunities

Question 6 – What do you believe to be the key medium to longer-term challenges relevant to STPR2 arising from the Covid-19 pandemic on travel demand and patterns in your region/nationally?

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

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[1] https://www.gov.scot/publications/green-recovery-low-carbon-energy-project-capital-funding-form-and-guidance-2/

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 generally and delivering the sustainable transport hierarchy, specifically. 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 an exponential continued growth in car/motorised transport use.

The continued requirement for physical distancing in society presents a challenge for transport demand over the medium to longer-term. Public transport is critical for enabling multi-modal journeys, with associated benefits for health, reduced congestion, and improved air quality. If access to public transport is limited, as has been the case during the current pandemic, this could have implications for the uptake of active travel modes, where they make up part of the total journey with public transport, especially in town and city centres. Supporting people to travel in the most sustainable way possible, using active modes and public transport, whilst maintaining physical distancing will be a key consideration of transport decision making going forward, and is necessary to ensure there is not a sustained long-term increase in car use and ownership.

Question 7 – What do you believe to be the key medium to longer-term opportunities relevant to STPR2 arising from the Covid-19 pandemic on travel demand and patterns in your region/nationally?

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. 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 to December 2020 were much higher and increased by more than 100% in some areas[2]. This mirrors evidence outlined in the Phase 1 report, which shows a significant increase in cycling trips and people reporting they are cycling more. This presents an important opportunity to capitalise on and embed these positive changes over the medium to longer-term.

Going forward, action is needed to permanently embed this (behaviour) change, with the aim of achieving a sustained modal shift to active travel, and the reduction in transport emissions that results from increased rates of cycling and walking. Action also needs to focus on measures to reduce demand for cars, and decisions on the allocation of investment in the transport system. We note and welcome recognition of this opportunity, and resulting necessary actions, on page 24 of the Phase 1 report.

We note the three immediate priorities outlined on page 16 of the Phase 1 report on what needs to be done to ensure a sustainable recovery that are relevant to STPR2. We welcome these. They should form the basis of prioritisation for transport planning and investment decision making, both in the immediate short-term, and over the medium to longer-term.

Question 8 – How well do you feel the Case for Change element has engaged with stakeholders and the public?
- Well

Question 9 – Have you or your organisation participated in events or previous online surveys in relation to STPR2?
- Workshops

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[2] https://www.cycling.scot/news-article/six-month-stats-see-cycling-up-43-in-scotland

- Surveys

Question 10 – What worked well and what could have been improved in the Case for Change stakeholder and public engagement?

N/A

Question 11 – Overall, has the Case for Change element of STPR2 met you or your organisation's expectations?
- It has met some of my or my organisation's expectations

Question 12 – Please explain why the Case for Change has or hasn't met all your organisation's objectives?

The Case for Change element and section in the report recognises and acknowledges many of the key challenges facing the transport system, both now in the context of the climate emergency, and also going forward in our emergence and recovery from the pandemic. This is welcome; however, the Case for Change would benefit from specifically recognising the need to improve safety for vulnerable road users, including people cycling. Concern about personal safety when cycling on the road is the main barrier to cycling[3] and needs to be addressed to deliver desired levels of modal shift and to align with the sustainable transport hierarchy.

Question 13 – Please provide any other comments on the Case for Change element of STPR2.

N/A

Phase 1 Report

Question 14 – Do you feel the eight themes within STRP2 Phase 1 capture what needs to be in the short-term, in relation to transport investment priorities?
- Agree

Question 15 – Do you feel the themes appropriately address challenges and opportunities described within the report?
- Yes

Question 16 – Please use this space to provide any further comments on the challenges and opportunities described within the report.

The challenges and opportunities outlined in both the Phase 1 and Case for Change reports recognise many of the key priorities and actions required.

In particular, it is welcome that embedding the sustainable investment hierarchy within STPR2 is outlined as a key priority, specifically ensuring that interventions are prioritised, firstly by their ability to reduce the need for travel, and then secondly to help maintain, enhance, and safely operate existing infrastructure.

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[3] Cycling Scotland (2020) Annual Cycling Monitoring Report
https://www.cycling.scot/mediaLibrary/other/english/8674.pdf

Question 17 - Do you feel that the Phase 1 interventions associated with the eight themes support the priorities and outcomes of the National Transport Strategy?
- Agree

Question 18 - Please use the space below to provide any further comments that you wish to make on the eight themes.

Theme: Supporting smart and sustainable travel across Scotland

We welcome the three interventions proposed under this theme.

With regards to intervention 1 on active freeways, this is an important recognition of the critical need for high quality active travel infrastructure on arterial routes to urban centres and on major routes. Greater clarity will be welcome on how and where the funding will be allocated, over how many years the funding is allocated for and how the level of funding will match the level of ambition.

With regards to intervention 2 on expansion of 20mph zones, this is a welcome commitment and acknowledges the significant negative safety impact of vehicle speed for people cycling and other vulnerable road users. To keep expanding the evidence base, there should be a commitment to ensure any 20mph schemes implemented are thoroughly evaluated to contribute to, and further enhance, the evidence base.

With regards to intervention 3, we welcome the commitment to promoting behaviour change and to 'locking-in' the positive travel behaviours seen during the pandemic over the long(er)-term. We consider that greater emphasis needs to be placed on achieving the required scale of behaviour change and it should be acknowledged that this will not happen overnight. It is imperative that work is redoubled to influence behaviour as we emerge from the pandemic and that a trajectory of targets is set out to demonstrate progress. Only by adopting this approach will it be possible to influence people's travel choices effectively.

Recognition in the report that changing behaviour is required and that individual travel behaviour decisions are complex is welcome; however, the report needs to effectively capture what can, or should, be done to deliver required levels of behaviour change and recognise current successful behaviour change initiatives which already exist, including how these can be utlilised and further extended where appropriate.

Theme: Creating smart and sustainable towns and villages

We note and welcome intervention 4 under this theme.

An increased focus on localism and increased appreciation of local places and spaces has been a positive outcome of the pandemic and presents an opportunity going forward. It is imperative action is taken to further embed positive changes in this regard. People walking and cycling, and using public transport, should have priority over private motorised vehicles in towns and cities. Modal shift to active and sustainable travel modes helps to reduce emissions, improves air quality, and can reduce inequality.

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 are recognised and that a one-size-fits-all approach may not be workable.

Towns and city centres should be for people not cars, and the planning system has a crucial role to play in this regard through promoting active travel for delivering better, greener places. Places and spaces designed for cycling have strong economic benefits associated with them, including increased retail activity, higher house prices, reduced health care costs and greater productivity. Cycling is good for business. It helps to create greater footfall which is associated with an increase in trade and revenue for shop owners. Retail sales can increase by as much as a quarter where bike lanes are provided[4]. Research has shown that retailers often underestimate the proportion of customers who access shops and local businesses by bike and over-estimate the proportion of car users among their customers. Cycling delivers five times higher spend than the same area of car parking, and people who cycle do their shopping locally and are more loyal customers[5] .

Theme: Transforming cities

We note and welcome intervention 7 (reallocation of road space for active travel) under this theme.

We welcome the support given to local authorities to introduce temporary cycling and walking infrastructure to support people to travel actively for essential journeys during the initial lockdown. Evidence from a recent survey carried out highlights the importance of dedicated separated infrastructure to encourage cycling, with more than a quarter of survey respondents stating that dedicated cycle paths would be the most likely factor to encourage them to cycle after the (initial) lockdown[6]. In this regard, in response to the current pandemic, there is a need to ensure that transport infrastructure decision-making and spending as part of STPR2 takes into account the need to deliver space separated for different users, especially in busier urban town and city centres with cycle lanes physically separated from footways and the carriageway. Space allocation decisions and ensuring sufficient footway and cycle path width, will help physical distancing for active travel and public transport, both now and in response to future pandemics. Where possible, we would like to see schemes funded under the Spaces for People initiative made permanent, to help support a continued and sustained shift in behaviour to active travel.

We note in the Case for Change national document it states that land use planning is out with the scope of STPR2. Despite this, it is important that consideration of the impact of planning decisions and key linkages with transport on areas that are within the scope of STPR2 are accounted for. These connections could be drawn out further, and more strongly emphasised, than currently in the Phase 1 report.

Society continuing to be built around roads is inherently unequal, and road reallocation to active and sustainable modes needs to be prioritised both in the short and long-term. 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 instead of expanding new road capacity is essential. We have previously called for a trajectory to end new trunk road

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[4] Designed to Move: Active Cities report https://activelivingresearch.org/blog/2015/07/designed-move-activecities#:~:text=The%20report%20shows%20that%20cities,improved%20health%20and%20well%2Dbeing.
[5] European Cyclists Federation (2019) The benefits of cycling: Unlocking their potential for Europe https://ecf.com/sites/ecf.com/files/TheBenefitsOfCycling2018.pdf
[6] https://www.cycling.scot/news-article/new-lockdown-cycling-survey

building in Scotland[7] and would like to see this prioritised in STPR2. We would like to highlight a recommendation from the Infrastructure Commission for Scotland in this regard which states:

> "For such roads investment… a presumption in favour of investment to future proof existing road infrastructure and to make it safer, resilient and more reliable rather than increase road capacity"[8].

We support this recommendation and feel that STPR2 has to take it into account.

The Phase 1 report, whilst encouraging active travel and public transport use, says little around what will be done to restrict car use both now and going forward. Limiting investment in expanding road capacity is crucial for climate change, air pollution, road safety and social inclusion objectives, and is required if desired levels of modal shift to active travel and public transport are to be achieved. Alongside measures to encourage modal shift to active and sustainable modes, measures to reduce demand for cars and decisions on the allocation of investment in the transport system need to be taken, if road reallocation policies are to achieve the desired impacts and outcomes. Understanding of this in the Phase 1 report is lacking and needs to be strengthened.

To deliver fair access to transport, reduce health inequalities, improve air quality, and improve road safety in our towns and cities, everyone should be able to walk or cycle for most of their regular, local journeys. Safer streets with cleaner air require taking space from private vehicles to make more room for walking and separated cycling. A long-term approach with increased and multi-year funding is urgently required to support local authorities to deliver this.

Theme: Supporting transition to low-carbon transport

We note intervention 13 (investment in low carbon and alternative fuel systems) under this theme.

Whilst low emission vehicles do have a role to play, we stress it is important not to rely upon them 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, including from very harmful particulate matter emissions from braking and tyre wear[9], 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, may continue to discourage people from cycling. The focus should be on promoting delivery of the sustainable travel and investment hierarchies, implementing and embedding them into budget decisions, and prioritising active travel (and other sustainable modes).

We note on page 19 of the report it states:

> *"Fundamental to the delivery of an inclusive net zero economy and thus improve health and wellbeing, is the requirement to support and accelerate the transition to low emission vehicles".*

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[7] https://www.cycling.scot/mediaLibrary/other/english/7079.pdf

[8] Infrastructure Commission for Scotland (2020) Phase 1: Key findings report. A blueprint for Scotland https://infrastructurecommission.scot/storage/238/ExecutiveSummary_160120.pdf

[9] Lelieveld, J, K. Klingmuller, A. Pozzer, U. Poschl, M. Fnais, A. Daiber, and T. Munzel (2019) 'Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard ratio functions' European Heart Journal 0:1-7 https://academic.oup.com/eurheartj/advancearticle/doi/10.1093/eurheartj/ehz135/5372326

This focus on such vehicles is contrary to many of the objectives and proposals outlined in STPR2 and related policies, and risks undermining the achievement of desired outcomes.

Theme: Enhancing safety and resilience on the strategic transport network
We note intervention 17 (investment in trunk road network asset).

As previously mentioned, we have called for a trajectory to end new trunk road building in Scotland and would like to see this prioritised. In line with the recommendations from the Scottish Infrastructure Commission and the sustainable investment hierarchy, as outlined in the Infrastructure Investment Plan, there should be a presumption in favour of cycling and walking in any transport appraisal process and STPR2 should be primarily focused on delivering improvements to active travel and sustainable public transport.

Linked to climate change objectives, we would like to see a commitment within STPR2 to reduce traffic levels, and, in particular, pursuing the principle that HGVs and bikes shouldn't have to share the same road space. This is currently lacking from the Phase 1 proposals and is a gap which needs to be addressed.

We note proposals in this intervention to include a scheme for the removal of barriers to access, such as dropped kerbs and improved footway widths. These are welcome when taken as part of an overall approach focused on active and sustainable modes, as outlined above, and could be particularly beneficial for improving connectivity in rural communities, which are often more reliant on the trunk road network for their everyday mobility needs.

We note intervention 20 (Speed Management Plan).

Speed of traffic has a significant impact on road safety for people cycling. As previously outlined, we support the expansion of 20mph speed limits on urban, residential roads, many of which are currently likely to have speed limits of 30mph, and which are the roads used most regularly by people cycling. Evidence shows that the risk of serious injury or death for people cycling and pedestrians increases disproportionately as speed increases[10]. There should also be support for local roads authorities to review and lower speed limits on faster roads from 60 and 50mph, improving the safety for road users and reducing climate change emissions.

We are concerned by the proposal to increase speed limits for HGVs on the trunk road network, as detailed on page 70 of the report. Permitting an increase in speed limits for such vehicles will undermine the achievement of both road safety and climate change objectives and targets and should be reconsidered.

Question 19 - 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

Question 20 – How well do the Phase 1 interventions support Scotland's recovery from the Covid-19 pandemic in the short-term?
· Well

Question 21 - Please use the space below to highlight the Phase 1 themes and interventions, that you particularly support

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[10] Cycling UK 20 mph: lower speeds, better streets http://www.cyclinguk.org/campaign/20-mph-lowerspeeds-better-streets

As per response to question 18.

Question 22 - Please use the space below to highlight where you disagree with any the Phase 1 themes or interventions.

As per response to question 18.

Question 23 - Please use the space below to provide any other comments you wish to make on the STPR2: Update and Phase 1 Recommendations report.

Overall, the Phase 1 report sets out the ambition to deliver a transport system focused on active and sustainable modes with embedded delivery of the sustainable transport and investment hierarchies, which is welcome. However, it lacks detail, both in terms of actions and funding commitments, on how this will this be delivered and achieved both in the short and medium to long(er)-term. We would like to see such detail included in Phase 2 activity and reporting.

There are several areas missing from the Phase 1 report that we believe should be included.

Opportunities for public transport integration with active travel, to improve connectivity and facilitate sustainable door-to-door journeys, are not effectively captured. Opportunities should be focused on improvements to both walking and cycling access to railway stations and key bus/other public transport interchanges, and providing proper space for carrying bikes on public transport. Currently, where cycle space does exist on public transport, this is often insufficient and there is inconsistency with how bike users are dealt with. Government should prioritise promoting integrated transport options. Public transport has positive impacts on the whole transport system. It takes vehicles off the roads, reducing congestion, and can make it easier to remove space from vehicles for wider pavements and cycling infrastructure.

Improving access to bikes is also not mentioned in the Phase 1 report. Currently, only 35% of households have access to a bike[11], with the lowest levels of access amongst those in the lowest income socioeconomic groups. To address this, support and funding should be targeted at bike share schemes, cycle training and secure bike storage, to make cycling an easy, safe, and affordable choice. Increasing access to bikes is key to addressing inequality and reducing transport poverty, a key focus of the National Transport Strategy. Access to bikes is an essential first step in encouraging modal shift and should be considered within STPR2.

In relation to the above, the importance of cycle training is not effectively captured. Increasing availability of cycle training, while outside the scope of STPR2, is a key activity in addition to, not as a substitute to, physical infrastructure changes for cycling.

With regards to freight and ensuring that the negative impacts generated from the movement of goods are tackled, the use of e-cargo and cargo bikes as options for short (and last mile) deliveries should be explored and are currently not captured in the report. These bikes can potentially help to remove a significant number of, particularly light goods, vehicles from urban roads, helping to reduce congestion, improve air quality, and improve safety for vulnerable road users.

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[11] Cycling Scotland (2020) Annual Cycling Monitoring Report 2020
https://www.cycling.scot/mediaLibrary/other/english/8674.pdf

A strategic problem not yet effectively captured is the requirement for an investment guidance framework to inform long-term strategic investment decision making. We support the recommendation of the Infrastructure Commission to develop a new investment appraisal and decision-making process, by the end of 2021, taking into account necessary changes to current STAG and Investment Decision Making guidance. Strategic investment decisions should be focused on substantially increasing the proportion of journeys by active travel and providing an enhanced role for public transport. This requires stronger emphasis in STPR2.