

STP Regional Transport Strategy

Cycling Scotland submission October 2022

Question 2. Are you responding on behalf of an organisation?

- Yes

Question 3. Please state the name of the organisation.

- Cycling Scotland

Question 7. The RTS Strategic Framework, which includes the RTS Priorities, Targets, Objectives, and Policies for the new strategy, is set out in Chapter 6 of the draft RTS document. Does the RTS Strategic Framework support your organisation's strategic aims?

- Yes

Question 8. Please provide additional comments to support your answers.

The framework has a strong focus on active travel, increasing cycling, and improving health and wellbeing through transport. Integrated ticketing, a modal shift to active travel, and a reduction of car kilometres are very welcome and make a significant improvement on the current strategy.

Working with others, Cycling Scotland creates and delivers opportunities and an environment so anyone, anywhere in Scotland can cycle easily and safely. To do this we need to work in partnership with organisations such as SPT and it's encouraging to see that policies such as a reduction in road transport emissions, a reduction in car kilometres and a modal shift from private passenger cars to more sustainable modes and methods are mentioned as key targets that this strategy is hoping to achieve.

However, we would like there to be more focus on partnership – for example, strategic partners SPT intend to work with to achieve some of this work. We also note that many of the sections mention expanding active travel infrastructure and connections “where possible”, and it's key that this is bolder – almost everywhere should be possible when we are talking about active travel routes and integration.

Question 9. Does the RTS Strategic Framework provide a strong basis for improving transport in the region?

- Yes

Question 11. How important is the policy theme 'Accessing and Using Transport' to you or your organisation?

- Very important

Policy: P.A1 Accessible transport

Ensure the transport system is accessible to all. Support delivery of the Scottish Accessible Travel Framework (SATF) and Annual Delivery Plans within the region. Improve the convenience, comfort and certainty of experience for people when travelling by active travel or public transport, particularly people who have a disability including non-visible disability. Ensure accessibility is considered in the application of the sustainable travel hierarchy and is a core objective in transport innovations and new forms of transport services and infrastructure including Electric Vehicle charging infrastructure.

Question 13. Do you support this policy?

- Yes

Question 14. Please provide comments on this individual policy:

We welcome part of the policy, in particular, 'Improve the convenience, comfort and certainty of experience for people when travelling by active travel or public transport, particularly people who have a disability including non-visible disability.' It is important to note that the rate of people cycling who are disabled is significantly lower and adaptive bikes such as trikes can support access to active travel for a number of disabled people. It's vital that the sustainable hierarchy is not abandoned when planning for transport facilities for disabled people, but rather adapted as needed with consultation from disabled people themselves and that Cycling by Design guidance is used to ensure there is inclusivity in planning and developing any new cycling infrastructure and cycle storage.

It is not clear what the implications of this element of the policy are: "Ensure accessibility is considered in the application of the sustainable travel hierarchy and is a core objective in transport innovations and new forms of transport services and infrastructure including Electric Vehicle charging infrastructure." For example, the provision of electric chargers for vehicles should not affect the accessibility of others- e.g. through blocking the footway. Further explanation would be helpful.

.

Policy: P.A2 Affordable transport

Promote and facilitate public transport to be more affordable, particularly for people living in poverty, in socio-disadvantaged communities and in rural and remote areas. Ensure public transport passengers find it easy to choose and access the best value ticket for their journey. Facilitate public transport ticketing to be more flexible, affordable and integrated and to better reflect the way people need to travel, particularly people who have insecure, part-time or shift work or unpaid care work. Ensure affordability is a core objective in developments and enhancements related to smart and integrated ticketing, Mobility as a Service and other relevant transport innovations. Develop and facilitate the role of active travel as an affordable transport option.

Question 15. Do you support this policy?

- Yes

Question 16. Please provide comments on this individual policy:

Improved delivery is required on ticket integration and increasing affordable access to public transport. We also note that active travel such as cycling can help build resilience during difficult times and in particular the current cost-of-living crisis so it is important that investment continues to grow for bike access and active travel infrastructure. A second-hand bike is a carbon neutral way to travel, requiring little extra expense. We support integrating cycling infrastructure and facilities with cycle sharing schemes, for example, Nextbike in Glasgow, which can help people make inexpensive shorter journeys which can include last mile and work journeys.

While many households in Scotland currently have cars, the phenomenon of [forced car ownership](#) shows us the financial stress of owning a car when on a lower income. Therefore, SPT should be doing everything possible to give access and opportunity for active travel at an affordable level to support people who have insecure, part-time or shift work or unpaid care work and those who live in SIMD areas.

Policy: P.A3 Availability of Transport

Ensure a minimum level of active travel and public transport coverage for all areas in the region to key locations, particularly town centres, employment centres, colleges and universities, hospitals and key sustainable transport hubs/interchanges, and aim for enhanced transport coverage where possible. Ensure transport networks reflect the needs of all communities, particularly groups and communities who are more likely to depend upon active travel or public transport for every day travel including women and single parent households, disabled people, young people, older people, lower income households, people who cannot drive and/or do not have access to a private car, and black and minority ethnic people. Improve the availability and stability of public transport services in rural, remote and island communities and socio-economically disadvantaged communities. Develop the role of local bus, Community Transport, taxis and other Demand Responsive Transport services, shared transport and shared mobility to ensure public transport is available to all communities.

Question 17. Do you support this policy?

- Not sure

Question 18. Please provide comments on individual policy:

We welcome the mention of coverage of active travel but believe that we need to go beyond the minimum to ensure connectivity and access for people travelling by bike. Active travel should not be seen as part of connectivity but as a key core of improving access. For example, shared taxis etc should not be prioritised or used as a reason not to develop more extensive cycling infrastructure or bike access. This policy should include the development of the role of active travel, bike share, subscription or lending schemes that would increase affordable access across the SPT region.

Policy: P.A4 Safety and Security of Public Transport

Increase personal safety and security of people using and accessing public transport services. Ensure everyone is able to use public transport services free from fear of harassment and discrimination based upon ethnicity, disability, sex, sexual orientation, gender identity or age. Promote safety by design and involve equality groups in the design process. Improve perceptions of personal safety and security of public transport services.

Question 19. Do you support this policy?

- Yes

Question 21. How important is the policy theme 'Reducing the need to travel and managing demand for car travel' to you or your organisation?

- Very important

Question 22. Do you wish to comment on the individual policies within 'Reducing the need to travel and managing demand for car travel' theme? If you select 'no', you will skip to the next policy theme.

- Yes

Policy: P.R1 Integration of transport and land use

Seek to minimise physical separation and travel distances between the places where people live and the places where people need to go to for work and other every day activities. Embed the sustainable travel hierarchy and sustainable transport investment hierarchy as key principles in land use policy and development plans and strategies. Support new development that is located in areas that are accessible by active travel and public transport, designed to facilitate movement by walking, wheeling, cycling and public transport, and integrated with existing and planned active travel and public transport networks, services and hubs.

Question 23. Do you support this policy?

- Yes

Question 24. Please provide comments on this individual policy:

Land-use planning has a key role to play in facilitating the necessary shift away from cars. SPT's role could be more proactive, championing new development plans and strategies that support access by active and sustainable travel as well as opposing those plans and developments that increase access by private vehicle.

[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 the 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 links to existing active travel

networks and public transport interchanges. Where new developments are being planned, primary consideration should be given to making sustainable connections to surrounding services.

Where links 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. It's key that any new developments are accessible by walking, wheeling and cycling , rather than just by active or public transport.

Policy P.R2: 20-minute neighbourhoods

Support and facilitate development of 20-minute neighbourhoods including developing improved active travel, public transport and sustainable mobility hubs.

Question 25. Do you support this policy?

- Yes

Question 26. Please provide comments on this individual policy:

We welcome reference to applying the concept of 20-minute neighbourhoods and feel that this should be the priority focus across the SPT region with SPT undertaking a leading and enabling role rather than a supportive role. These neighbourhoods could be the key to reducing short car journeys: [in 2019 54% of car journeys were under three miles](#).

Placemaking and active travel connectivity should also be important when creating 20-minute neighbourhoods as cycling can often be a quicker, more affordable, more reliable and more enjoyable way to travel when cycling infrastructure is direct and designed well. This concept can also help us decarbonise our housing, transport and reduce journeys which will help us meet both local and national climate targets.

Policy P.R3: Flexible working and remote access to services

Reduce the need to travel by supporting development of digital & remote access to public services and flexible working models.

Question 27. Do you support this policy?

- Yes

Policy P.R4: Road space reallocation

Encourage and support reallocation of road space to active travel and public transport where possible to increase and enhance capacity for active travel and public transport and tackle car-centric road systems.

Question 29. Do you support this policy?

- Yes

Question 30. Please provide comments on this individual policy:

We support the policy to encourage and support reallocation of road space to active travel and public transport where possible to increase and enhance capacity for active travel and public transport and tackle car-centric road systems. Road space reallocation during the pandemic has shown us that with fewer cars on the road the rates of active travel and, in particular, cycling increases significantly.

There was a 47% rise in people cycling in Scotland from 23 March 2020 to 22 March 2021 compared to the same period 2019-2020. In the 2021 attitudes and behaviours survey on cycling 65% of respondents said that they did not feel safe on roads and 65% cited insufficient cycle lanes/traffic free options showing the potential of increasing cycling levels if these barriers are reduced through road space reallocation. SPT should help ensure road space reallocation enables increased dedicated space for public transport vehicles as well as dedicated space for active travel, protecting space for pedestrians, people on bikes and travelling by bus by reducing space for private car use.

Policy P.R5: Car demand management – parking

Encourage and support development of local parking policies that encourage more sustainable travel behaviours, in line with the sustainable travel hierarchy. Investigate and develop pricing strategies for park and ride provision to encourage sustainable travel to bus, rail or Subway stations/hubs, where appropriate.

Question 31. Do you support this policy?

- Yes

Question 32. Please provide comments on this individual policy:

We feel that this policy should also include access to secure cycle, wheelchair, and mobility aid storage provision for multi modal journeys. Park and ride pricing should also be carefully considered in order to highlight the benefits of active and sustainable travel.

Policy P.R6: Car demand management – pricing

Support the investigation, development and implementation of road and parking pricing policies that encourage more sustainable travel behaviours and provide opportunities to fund active travel and public transport, in line with the sustainable travel hierarchy, and contribute to the development of the national Car Demand Management Framework. Support development of a Workplace Parking Licensing scheme in Glasgow and other towns in the region as appropriate.

Question 33. Do you support this policy?

- Yes

Question 34. Please provide comments on this individual policy:

To enable effective car demand management, this policy should recognise active and sustainable travel measures require specific investment and cannot be dependent on any income from pricing strategies for workplace parking. While we welcome that the workplace parking levy is listed as an option for parking demand management at the moment the income from this is not clear.

Policy P.R7: Behavioural change

Facilitate a change in behaviours and attitudes towards travelling by car particularly travelling to school by car where high quality, active travel and public transport alternatives are available. Support Smarter Choices and promote more sustainable travel behaviours for all journey types including journeys made for leisure, recreational and tourism purposes.

Question 35. Do you support this policy?

- Yes

Question 36. Please provide comments on this individual policy:

We support commitment to behaviour change within this strategy and think that significant work can be done in this area between Cycling Scotland and SPT. There could be potential for expanding capacity for SPT, active travel orgs, local authorities and schools to work together.

SPT could also play a valuable role and contribute to increased roll out of school zones as well as working with Cycling Scotland on expanding Cycling Friendly Schools, campuses and organisations.

We know that the fear of road traffic is the number one reason people don't cycle and infrastructure is vital to overcome this, but evidence also shows there are more personal reasons, and significant partnership work is needed to help ppl overcome barriers.

An example from a project Sustaining Dunbar in Shifting Normal report shows how much research and factoring of attitudes was needed in order for people to make a change. The 2021 attitudes and behaviours survey also showed several personal reasons for not cycling, these included not having the time (45%), not being fit enough (39%), health (30%), inability to ride a bike (18%) and not liking cycling (35%), while these are lower than safety and infrastructure concerns significant partnership work is needed to help people overcome these barriers.

While reduced travelling by car to schools is vital, increasing the number of children undertaking Bikeability Scotland in schools is important. Our Annual Cycling Monitoring report shows data across local authorities on this.

Policy P.R8: Shared transport and shared journeys

Facilitate and support improved and increased shared transport provision in the region. Support a shift in car ownership behaviours from private ownership to shared transport. Facilitate and support increased sharing of journeys in the region, aiming to increase car vehicle occupancies for journeys that need to be made by car.

Question 37. Do you support this policy?

- Not sure

Question 38. Please provide comments on this individual policy:

While we agree in principle that increasing vehicle occupancies are better than single occupancies, as is mentioned in the [route map to reducing car kilometres](#), any reference to shared journeys must include more options than the car as it is an opportunity to move people away from cars. The policy should include references to all shared transport options including bike share and mobility hubs.

Question 39. How important is the policy theme 'Enabling walking, wheeling and cycling' to you or your organisation?

- Very important

Question 40. Do you wish to comment on the individual policies within 'Enabling walking, wheeling and cycling' theme? If you select 'no', you will skip to the next policy theme.

- Yes

Policy: P.AT1 Regional Active Travel Network

Facilitate walking, wheeling and cycling to be the natural choice for every day, shorter journeys in line with the Sustainable Travel Hierarchy. Aim to make travelling actively more attractive than travelling by car as much as possible. Ensure active travel networks are convenient, safe, accessible, inclusive and promote good health and wellbeing, aiming for full segregation from motorised traffic as much as possible. Develop active travel as a mass transit mode on high travel demand corridors and support development of Active Freeways. Develop active travel networks in built up areas to include both direct routes and green networks as much as possible to provide choice and maximise opportunities for healthy and sustainable travel behaviours. Facilitate development and delivery of a regional active travel network to achieve excellent active travel connectivity in the region and ensure integration with other sustainable transport modes including bus, rail, ferry, Subway and Clyde Metro.

Question 41. Do you support this policy?

- Yes

Question 42. Please provide comments on this individual policy:

We believe that for more people to leave the car active travel should be a convenient and safe option and that our cycling infrastructure should be well connected, designed and maintained. [Cycling by Design 2021](#) provides guidance for permanent cycling infrastructure design on roads, streets and paths in Scotland which will support new, returning or less confident users to view cycling as a safe, practical, and attractive choice. As well as creating new infrastructure, we need to ensure that current infrastructure is well maintained too.

[Quality active travel routes must be planned and built systematically, not on an ad hoc basis](#) and sustainable travel hierarchy should be guiding us in every step of transport planning. Active Freeways present the opportunity of developing the necessary infrastructure that will allow people to make short and medium distance trips by walking, wheeling, and cycling, by safe active travel infrastructure in the future.

Additionally, for connectivity to truly work, we cannot do this without integration – it must be possible to take a bike no matter where you go. Since the biggest public sector transport within SPT area is a bus, there need to be spaces for bikes on buses, (taking [Border's Buses as an example](#)) and [we encourage collaboration with the private bus companies within the city to make this a possibility](#).

Policy: P.AT2 Accelerated delivery of walking, wheeling and cycling infrastructure and facilities

Enable accelerated delivery of new and enhanced walking, wheeling and cycling infrastructure and facilities to achieve a step change in active travel provision as soon as possible. Facilitate and support delivery of Scotland's Active Travel Framework in the region.

Question 43. Do you support this policy?

- Yes

Question 44. Please provide comments on this individual policy:

We strongly support this policy and the commitment to the Active Travel Framework. Rather than highlight active and sustainable travel, active travel should be explicitly referenced in the targets. High quality walking, wheeling, and cycling infrastructure should be available to everyone and would welcome data gathering on Km of traffic-free walking and cycling facilities and distance to traffic-free cycling infrastructure on a local level. We realise that this work needs political leadership, partnership and investment but bringing active travel up on the agenda will mean improved health and wellbeing outcomes for all, including those who do not cycle, but will benefit from cleaner and safer streets.

We need to work towards outcomes where walking and cycling are easy choices will be safer for everyone, promote healthy living choices, play a role in treating and preventing disease, and reduce health inequalities. We know that [for some people who experience mental health issues public transport can reduce comfort and wellbeing and that active travel in research on this was the only mode of travel that supported wellbeing.](#)

Active travel has health and wellbeing benefits and therefore accelerating delivery of new and enhanced walking, wheeling, and cycling infrastructure and facilities will pay dividends in the future. As well as developing new infrastructure, the policy should acknowledge commitment to maintaining existing infrastructure such as pedestrian footpaths and cycleways.

Policy: P.AT3 Access to bikes

Increase access to bikes and enable bike ownership including adapted bikes and other non-standard bikes.

Question 45. Do you support this policy?

- Yes

Question 46. Please provide comments on this individual policy:

We are pleased to see this policy and mention of adaptive bikes in the SPT document because not having access to bike or bike storage is one of the biggest barriers and especially for people based within Glasgow and Clyde as we have learned in our recent [Residential Cycle Storage report that showed Glasgow City Council as the main local authority with the biggest demand for cycle storage.](#) Increasing affordable access to bikes should be a priority, especially as the [new circular economy bill is due to be published within this parliamentary session.](#)

Increasing access to bikes for both adults and children means that people who face inequalities can overcome barriers of affordability, especially important to support children to learn to cycle. Additionally, as disabled people are less likely to cycle, adapted bikes can be helpful in encouraging cycling. It is important to state that bikes alone are not enough: training, secure storage and accessible cycle infrastructure are needed.

Policy: P.AT4 Integration of walking, wheeling and cycling with other sustainable transport modes

Increase and enhance integration of walking, wheeling and cycling networks and facilities with other sustainable transport modes including bus, rail, ferry, Subway and Clyde Metro.

Question 47. Do you support this policy?

- Yes

Question 48. Please provide comments on this individual policy:

We welcome increase and enhancement of integration of walking, wheeling and cycling networks and facilities with other sustainable transport modes as this will enable people to connect on journeys and make active travel more attractive and faster. In particular we would like to see a joining up of cycle routes within the SPT region.

Policy: P.AT5 Integration of micromobility and walking, wheeling and cycling

Support development of emerging micromobility transport, such as e-scooters, and support the safe integration into active travel networks.

Question 49. Do you support this policy?

- Not sure

Question 50. Please provide comments on this individual policy:

When considering introducing e-scooters (and other micromobility vehicles), the needs and safety of all road users, including users of e-scooters, pedestrians and other vulnerable road users like people cycling, need to be fully considered. Micromobility vehicles, such as e-scooters, are not proven as being safe on road carriageways but there could be an argument to test them on quieter lower speed roads (20mph roads), where there is likely to be less risk to both users of such vehicles and other road users, and to help keep them off pavements. In terms of safety, there should be a process of continual review of evidence to learn lessons from other countries and cities where e-scooters are legal and more popular.

Evidence from the US has also shown that e-scooter users are far more likely to be injured on the roads, with their lightweight design and narrow wheels unsuitable for safely navigating potholes and uneven road surfaces. This lightweight design also makes it challenging to safely perform an emergency stop when required. Further, it can be very difficult to give a directional signal when on a moving e-scooter and for the user to look over their shoulder to check if the road they intend to turn into is clear. There is also the potential for conflict with other road users. These factors should be considered when reviewing the status of e-scooters both on carriageways and on cycling infrastructure.

Question 51. How important is the policy theme 'Enhancing quality and integration of public transport' to you or your organisation?

- Very Important

Question 52. Do you wish to comment on the individual policies within 'Enhancing quality and integration of public transport' theme? If you select 'no', you will skip to the next policy theme.

- Yes

Policy: P.PT1 Integrated public transport system

Enhance the quality and integration of the public transport system, aiming for a highly integrated, world class, passenger focused system that attracts users away from less sustainable modes of travel particularly private car usage. Promote and facilitate integration of public transport systems including networks, services, ticketing, information, marketing, and passenger facilities, aiming for a more unified system that is easy and convenient for passengers to navigate. Improve public transport service quality particularly reliability, punctuality and frequency. Improve passenger satisfaction including value for money and increase perceptions of the public transport system as attractive, convenient and desirable. Facilitate and support integration of public transport with other modes. Ensure public transport governance models facilitate and enable delivery of the regional transport strategy.

Question 53. Do you support this policy?

- Yes

Question 54. Please provide comments on this individual policy:

Rather than only aiming to have a single system, we should aim for an integrated system to enable multi modal journeys, given the climate emergency and transport poverty across SPT region. Integration of public transport and cycling also has a long way to go and, until this becomes more seamless and effort free, people will often find the car more convenient. This especially applies to people with caring responsibilities, people doing shopping and people living in rural areas. Transport audits and active travel modelling can be affective in future planning for an integrated transport and to move towards a more active and sustainable transport.

Policy: P.PT2 Ticketing and information

Develop and facilitate enhanced integration of public transport systems for ticketing, travel information, booking and payment activities across all public transport modes in the region including inter-regional connections where appropriate. Aim for a single, integrated system, providing users with a high quality, simple and accessible experience for planning, booking and paying for travel on public transport. Integrate and align developments in ticketing and information with wider developments in Mobility as a Service.

Question 55. Do you support this policy?

- Yes

Policy: P.PT3 Mobility as a Service

Develop and facilitate Mobility as a Service (MaaS) in the region, building upon existing opportunities including ZoneCard where appropriate. Ensure MaaS platforms are interoperable with cross-regional and national MaaS solutions where appropriate.

57. Do you support this policy?

- Yes

Policy: P.PT6 Ferry quality and integration

Facilitate and support development of the ferry network in the region. Ensure the ferry network provides reliable and resilient services and meets the needs of island residents, businesses and visitors. Ensure ferry is integrated with the wider public transport system including island transport services to reduce adverse impacts of visitor car travel on Island communities and help achieve modal shift to sustainable travel methods.

Question 63. Do you support this policy?

- Yes
-

Question 64. Please provide comments on this individual policy:

We support the idea that ferry services should link in with sustainable transport and would welcome the opportunity for more cycling facilities on ferries to support island communities.

Policy: P.PT7 Subway quality and integration

Develop the Subway to be fully integrated with active travel, bus, rail and Clyde Metro. Ensure the Subway provides reliable and punctual services, offers good value for money and high levels of passenger satisfaction.

Question 65. Do you support this policy?

- Yes

Question 66. Please provide comments on this individual policy:

We support the idea that subway services should link in with sustainable transport and would welcome the opportunity for more secure and accessible cycling facilities near subway stations. Nextbike facilities at subway stations such as Bridge St and Patrick have shown the opportunity for integration between cycling and subway.

Policy: P.PT9 Community Transport, Demand Responsive Transport, Taxis and last mile connections

Increase and enhance the 'last mile' and community-level transport network. Develop the role and enhance integration of Community Transport, Demand Responsive Transport and

taxis, active travel and shared transport with bus, rail, ferry, Subway and the future Clyde Metro. Integrate walking, wheeling and cycling networks and facilities with public transport.

Question 69. Do you support this policy?

Yes

Question 70. Please provide comments on this individual policy:

Turning last mile into an active mile has potential to move people towards more sustainable and greener travel choices: most journeys are under five miles and many work journeys are under three miles. In a city like Glasgow, integrating walking, wheeling, and cycling networks with public transport creates the possibility of transformative change because so many people already use public transport rather than car and integration can make journeys more accessible, comfortable and connected. Access to active and sustainable modes of transport is crucial in improving road safety and addressing inequality 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 is key. Increasing access to bikes and storage facilities can also help to addressing inequality and reduce transport poverty across the region.

Policy: P.PT10 Park and Ride

Increase and enhance Park & Ride facilities and Park & Ride systems where local active travel and public transport connections to stops/hubs/stations are limited.

Question 71. Do you support this policy?

- Yes

Policy: P.PT11 Sustainable mobility hubs

Facilitate and support development and enhancement of public transport interchanges and sustainable mobility hubs. Support development of national Mobility Hub Delivery Framework and ensure development of a sustainable mobility hub network is integrated with development of 20-minute neighbourhoods. Ensure that best use is made of existing facilities and integration with all sustainable modes including active and shared modes and Community Transport is assured.

Question 73. Do you support this policy?

- Not sure

Question 74. Please provide comments on this individual policy:

We believe that mobility hubs should be improved, expanded and should enhance the focus towards cycling facilities. It is important that there is consultation with people cycling and cycling organisations when ensuring that best use is made of existing facilities.

Question 75. How important is the policy theme 'Improving road safety' to you or your organisation?

- Very Important

Policy: P.RS1 Road safety and vulnerable road users

Support and facilitate delivery of Scotland's Vision Zero where no is killed or seriously injured on roads by 2045. Support implementation of the Road Safety Framework and local Road Safety Plans and help meet road casualty reduction targets in the region. Aim for a sharp and consistent reduction in the number and severity of road traffic collisions in the region with particular focus on vulnerable road users including people who are walking, wheeling and cycling, children and young people, older people and disabled people.

Question 77. Do you support this policy?

- Yes

Question 78. Please provide comments on this individual policy:

Road safety is a priority area of focus because road safety concerns can people off using active travel modes due to the real and perceived dangers of the road. Local authorities and RTP have a big responsibility for working towards Vision Zero and we have been working with the police, transport leaders and researchers to understand how to make our roads safer. An important step mentioned here is support implementation of the Road Safety Framework and local Road Safety Plans and help meet road casualty reduction targets in the region. In particular reducing speed limits and to tackle speeding, especially on 30-60mph roads. We note that there is already work to reduce road speeds to 20mph across Glasgow and would also recommend further steps such as the principle that HGVs and bikes shouldn't share the same road space to reduce collisions further. We would like to see progress up to 2045 which will result in a sharp and consistent reduction in the number and severity of road traffic collisions in the region.

We acknowledge that vulnerable road users including people who are cycling are mentioned and while there needs to be cycling infrastructure city wide there could also be work done on reducing the risk and danger where this is greater to overcome extra barriers to cycling. Our [attitudes and behaviours survey in 2021](#) shows an example of cross cutting issues, for example respondents in the lower socio-economic groups were more likely to consider the roads in their local area as unsafe compared to the higher groups and 70% of guardians rated the safety of roads for children cycling with a score of 5 or less with 10 being extremely safe and 1 extremely unsafe.

Policy: P.RS2 Safe speeds

Support implementation of 20mph speed limits on a majority of roads in built up areas in the region including towns and villages. Support investigation and implementation of reduced speeds on rural roads in the region, where appropriate.

Question 79. Do you support this policy?

- Yes

Question 80. Please provide comments on this individual policy:

We welcome that 20mph is now mentioned and we have previously advocated that the inclusion of this is needed in the new strategy. We would like to see the introduction (or expansion where it already exists) of 20mph 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 and [we welcome the work that Glasgow City Council has already started](#) on this which can be replicated across the region.

Policy: P.RS3 Regional road network safety measures

Support implementation of road safety measures on the regional road network.

Question 81. Do you support this policy?

- Yes

Question 83. How important is the policy theme 'Decarbonising vehicles and improving air quality' to you or your organisation?

- Very important

Policy: P.GF1 Road transport vehicle decarbonisation

Facilitate and promote an accelerated transition to ultra-low emission road transport vehicles. Support and facilitate implementation of electric vehicle charging infrastructure. Support the development of regional / cross-boundary charging infrastructure networks including ensuring supply for rural and remote areas and integration with public transport and sustainable mobility hubs. Support introduction of tariffs for use of the electric vehicle charging network and support co-ordinated approaches to tariffs. Improve information and sharing of best practice related to road transport decarbonisation among consumers, business, freight sector and transport operators. Support and encourage bus operators to take up opportunities to decarbonise fleets, upgrade depots and develop partnerships with energy providers. Support and facilitate decarbonisation of the community transport sector in the region. Facilitate development of public charging infrastructure for bus and community transport particularly at SPT bus stations and integrate with sustainable mobility hubs as appropriate. Support and encourage innovation and investment in alternative fuels and fuelling infrastructure including Green Hydrogen particularly to support decarbonisation of larger vehicles including buses and public sector fleets. Support alignment of transport decarbonisation and clean energy strategies and promote cross-sector working including improving data sharing.

Question 85. Do you support this policy?

- Yes

Question 86. Please provide comments on this individual policy:

We welcome the transition toward decarbonised transport, in particular, for buses: decarbonisation can help us achieve cleaner air, reduce pollution and the rate of chronic diseases like asthma. However, we also think that the focus on electrical vehicles and charging points is disproportionate when our aim is to reduce car kilometres on our roads.

If we are to achieve a 20 per cent reduction in car kilometres by 2030 as per the Scottish Government [route map](#) then we need to focus on behaviour change, active travel infrastructure and public transport investment. Pollution from tyre and brake wear also occurs from electric vehicles, so transitioning to electric vehicles is only a small part of what we need to do in our planning work to make a lasting change that will reduce our emissions.

Policy: P.GF2 Rail decarbonisation

Support and facilitate decarbonisation of rail services in the region. Ensure investment in decarbonisation of rail services provides opportunities for improved and more resilient rail services and infrastructure in the region.

Question 87. Do you support this policy?

- Yes

Policy: P.GF3 Subway decarbonisation

Develop and implement a net zero carbon strategy for the Subway.

Question 89. Do you support this policy?

- Yes

Policy: P.GF4 Ferry decarbonisation

Support decarbonisation of ferry services in the region and implementation of Island Connectivity Plan. Ensure ferry decarbonisation provides opportunities for improved and more resilient ferry services and infrastructure in the region.

Question 91. Do you support this policy?

- Yes

Policy: P.GF5 Aviation decarbonisation

Support decarbonisation of regional air services particularly lifeline services to Argyll and Bute, Highlands and Comhairle nan Eilean Siar. Increase low carbon surface transport to Glasgow Airport and Prestwick Airport.

Question 93. Do you support this policy?

- Yes

Policy: P.GF6 Clyde Metro

Ensure that Clyde Metro is developed on the basis of minimising carbon and other harmful emissions. Promote lower energy consumption by incorporating renewable energies and zero emission transport designs as far as possible.

Question 95. Do you support this policy?

- Yes

Policy: P.AQ1 Low Emission Zones

Support implementation and promotion of the Glasgow Low Emission Zone. Support investigation and implementation of additional Low Emission Zones in the region as appropriate.

Question 97. Do you support this policy?

- Yes

Question 98. Please provide comments on this individual policy:

We support implementation and promotion of the Glasgow Low Emission Zone as well as investigation and implementation of additional Low Emission Zones in the region as appropriate. Cycling Scotland strongly supports the principles of LEZs and acknowledges the contribution they can make to encouraging people out of cars and towards more sustainable ways of travelling, including using a bike. This will have the greatest impact on reducing congestion and air pollution.

The biggest benefit of LEZs is cleaner air, which has many benefits beyond health. Scotland's [air quality strategy](#) shows the potential of active travel in this, showing a cyclical benefit between active travel, health and cleaner air– the more people are encouraged to walk, wheel and cycle means fewer people use vehicles that cause more greenhouse emissions. When our air is cleaner, we know that there is less chance of respiratory conditions being aggravated, we aren't passing down the legacy of polluted cities to future generations and we are encouraging more people to walk, wheel and cycle.

Policy: P.AQ2 Air Quality Management Areas

Support implementation and delivery of transport improvements and measures to improve air quality within Air Quality Management Areas in the region. Aim to reduce the number of AQMAs in the region.

Question 99. Do you support this policy?

- Yes

Question 100. Please provide comments on this individual policy:

In 2019, transport accounted for 36% of Scotland's greenhouse gas emissions, with road transport making up 66% of transport greenhouse gas emissions. Without drastic change we will keep missing our air quality targets. It's obvious that we need to invest in active travel to improve our health outcomes. Walking, wheeling, and cycling increase physical activity, significantly reduce cardiovascular incidence and mortality, and have been shown to reduce all-cause mortality.

Additional measures to reduce air pollution from road transport and to increase levels of active travel can therefore amplify benefits to public health. It is good that there is an aim to reduce the number of AQMAs in the region, but this needs to be developed into concrete objectives as well as compared to other regions. More research into air pollution would help significantly in this area.

Question 101. How important is the policy theme 'Moving goods more sustainably' to you or your organisation?

- Somewhat important

Question 102. Do you wish to comment on the individual policies within 'Moving goods more sustainably' theme? If you select 'no', you will skip to the next policy theme.

- Yes

Policy: P.MG1 Strategic freight transport

Facilitate and support strategic freight transport to be more sustainable and energy efficient. Increase resilience and reliability of strategic road, rail and maritime freight transport. Enable strategic freight modal shifts, particularly from road to rail and to maritime transport where appropriate. Support and facilitate best practice and innovation in freight transport in the region.

Question 103. Do you support this policy?

- Yes

Policy: P.MG2 Urban freight and last mile deliveries

Facilitate and support more sustainable and efficient movement of goods in City/town centres. Reduce adverse impacts of goods traffic on local roads networks and communities. Facilitate and support increased freight modal shift and innovation of the 'last mile' delivery to be more sustainable and to support development of 20-minute neighbourhoods.

Question 105. Do you support this policy?

- Yes

Question 106. Please provide comments on this individual policy:

We feel that significant progress can be made in this area, especially as the cargo bikes and e-bikes become more popular. These have the potential for decarbonising local and last mile deliveries, to making our roads cleaner and safer and can help the modal shift towards active travel.

It is important that cargo bikes are considered when looking at freight shift as studies show they can be cleaner than vans and can result in faster deliveries. There are also some examples of cargo bike use by local business in Edinburgh which can inspire cargo bike funding and expansion in other urban areas.

Policy: P.MG3 Freight hubs and facilities

Facilitate and support development and enhancement of freight hubs and freight facilities. Support development of freight consolidation hubs and networks.

Question 107. Do you support this policy?

- Yes

Question 109. How important is the policy theme 'Increasing resilience and adapting to climate change' to you or your organisation?

- Very important

Question 110. Do you wish to comment on the individual policies within 'Increasing resilience and adapting to climate change' theme? If you select 'no', you will skip to the next policy theme.

- Yes

Policy: P.RA1 Climate Change Adaptation

Facilitate and support adaptation of the regional transport system to the impacts and effects of climate change including regional roads, coastal rail lines, ferry terminals and harbours, Subway, and flooding of rail, road and path networks. Adapt the transport system to protect the health and wellbeing of transport system users from climate change impacts including higher temperatures and heat stress. Ensure new transport investments including Clyde Metro are future proofed for impacts of climate change and a low carbon future.

Question 111. Do you support this policy?

- Yes

Question 112. Please provide comments on this individual policy:

We believe that with the increasing effects on climate change adaptation plans should not wait. We have already seen an increase in disruption in the transport sector over the last few years and believe that reducing emissions as a priority is needed. Cycling has a part to play in this because modal shift to active travel can help reduce emissions but can also make people more resilient when disruption does happen, ensuring that people can travel to vital services reliably. For this to work there must be maintenance of cycle lanes as a priority, new cycling infrastructure and adaptation funding that local authorities can use.

Policy: P.RA2 Resilience

Increase resilience of the regional transport system from disruption. Reduce adverse impacts of transport system disruption on people and business.

Question 113. Do you support this policy?

- Yes

Policy: P.RA3 Flood risk management and mitigation

Support increased integration of transport and flood risk planning. Encourage and develop opportunities to support flood risk management actions through transport projects and infrastructure, where appropriate.

Question 115. Do you support this policy?

- Yes

Question 116. Please provide comments on this individual policy:

We believe that it is important to support flood risk management actions through transport projects and infrastructure, we would like to see cycling infrastructure as part of this. As flooding is set to become more frequent it is important that there is joined up thinking and planning across the sector on this.

Question 117. How important is the policy theme 'Protecting and enhancing natural and built environments' to you or your organisation?

- Very important

Policy: P.EV1 Biodiversity and green infrastructure

Protect and enhance biodiversity where possible. Develop and implement green infrastructure and other nature-based solutions as part of transport plans and transport projects where appropriate.

Question 119. Do you support this policy?

- Yes

Policy: P.EV2 Green networks

Support and facilitate integration of green networks and active travel networks where appropriate particularly in built up areas.

Question 121. Do you support this policy?

- Yes

Question 122. Please provide comments on this individual policy:

We support integration of green networks and active travel networks in built up areas and feel that this should be done across the area, rather than just where is appropriate. It is important that active travel networks are joined up, easy to use and are maintained – this is especially important for any greenery nearby which should not block any cycling infrastructure. As Cycling by Design mentions, cycling infrastructure can ‘allow opportunities for planting, sustainable drainage and other forms of blue-green infrastructure to enhance cycling facilities.’ Well-designed facilities make choosing active travel modes more attractive and easier.

Policy: P.EV3 Built environment and high-quality places

Protect and enhance the built environment where possible. Integrate placemaking and public realm plans and projects with transport plans and projects where appropriate.

Question 123. Do you support this policy?

- Yes

Question 124. Please provide comments on this individual policy:

We strongly believe that placemaking principles should be applied in any new projects and that they can help us place wellbeing and connectivity at the heart of transport planning. The place standard is an effective tool for councils and communities and can help us understand the nature of communities, how to plan around greater wellbeing and how we can move towards active travel. It is important that 20-minute neighbourhoods and placemaking are both part of the new strategy because it is vital that we look at communities holistically, undertake audits of what needs to be improved, but also start from a positive place when consulting for new ideas.

Question 125. How important is the policy theme ‘Connecting Places’ to you or your organisation?

- Somewhat important

Policy: P.CP1 International connectivity

Improve, increase and enhance sustainable inter-national connectivity of the region for passenger and freight transport and ensure the transport system supports a sustainable, inclusive, competitive, resilient and productive regional economy. The region's international transport gateways and routes to be maintained, improved or enhanced include:

- Connections to Glasgow Airport and Prestwick Airport;
- Connections to ports - Ocean Terminal, Hunterston, Ardrossan, Ayr, Troon, King George V Docks, Inchgreen, and connections to Cairnryan;
- Connections to England – including Glasgow Central station, Motherwell station, West Coast Mainline, Glasgow and South Western line, A76, A71, A72 and M8/M77/M74 and High-Speed Rail

Connections to road and rail freight facilities – Mossend, Eurocentral, and connections to Grangemouth

Question 127. Do you support this policy?

- Not sure

Policy: P.CP2 Inter-regional connectivity

Improve, increase and enhance sustainable inter-regional connectivity of the region for passenger and freight transport and ensure the transport system enables a sustainable, competitive, resilient and productive regional economy. The region's inter-regional transport gateways and routes to be maintained, improved or enhanced include:

- Connectivity to Argyll and Bute, Northwest and Western Isles
- Connectivity to Loch Lomond and Trossachs National Park
- Connectivity to Falkirk, Stirling and the North/Northeast
- Connectivity to Edinburgh, West Lothian and Scottish Borders
- Connectivity to Dumfries and Galloway

Connectivity of Arran – Argyll and Bute

Question 129. Do you support this policy?

- Not sure

Question 130. Please provide comments on this individual policy:

Policy: P.CP3 Intra-regional Connectivity

Improve, increase and enhance sustainable connectivity of regional strategic economic development and investment locations and intra-regional travel to work and freight corridors, and ensure the regional transport system enables sustainable development. Key strategic intra-regional connectivity priorities and corridors include:

- HMNB Clyde / Faslane, Helensburgh Growth Area and Helensburgh/HMNB Clyde – Balloch/Dumbarton – Clydebank - Glasgow

- Clyde Mission Clyde Corridor and Glasgow City Region City Deal investment locations
- Ayrshire Growth Deal strategic economic development and investment locations
- Glasgow - all cross-boundary radial corridors to/from Glasgow
- Intra-urban Ayrshire (Kilmarnock/Irvine/Kilwinning/3 towns/Troon/Prestwick/Ayr)
- South Lanarkshire – North Lanarkshire
- East Renfrewshire – Renfrewshire – West Dunbartonshire
- Inverclyde - Renfrewshire
- Ayrshire – Renfrewshire - Glasgow
- North Ayrshire – Inverclyde
- East Dunbartonshire – North Lanarkshire
- East Dunbartonshire – West Dunbartonshire

Ardrossan – Arran, Largs - Cumbrae and Rosneath Peninsula – Greenock

Question 131. Do you support this policy?

- Yes

Question 132. Please provide comments on this individual policy:

There are opportunities for active freeways and for more cycling infrastructure when looking at intra-regional connectivity. It is important that people are given the option to take their bike on public transport in order to help more people cycle for their journeys.

Policy: P.CP4 Town Centre connectivity and 20-minute neighbourhoods

Improve, increase and enhance active travel and public transport connectivity of the region's town centres to support town centre economies and delivery of 20-minute neighbourhoods.

Question 133. Do you support this policy?

- Yes

Question 134. Please provide comments on this individual policy:

The principles of 20-minute neighbourhoods should be considered to ensure there is connectivity between areas and so that people can use sustainable transport to get to their destinations. This is vital if we are to move to a wellbeing economy as overreliance on cars contributes to isolation, poor mental health and wellbeing and isolation from our neighbourhoods and communities. At the same time, active travel has shown several benefits such as increased exercise, improving our health and encouraging us to enjoy the outdoors. We would welcome more plans for 20-minute neighbourhoods in the region to increase active travel, but also build on placemaking and to increase our health and wellbeing.

Policy: P.CP5 Island, Rural and Remote Area Connectivity

Improve, increase and enhance transport connectivity for rural, remote and island communities particularly to nearest town centres and key transport hubs. Improve, increase and enhance transport connectivity for Arran, Cumbrae and Rosneath peninsula.

Question 135. Do you support this policy?

- Yes

Policy: P.CP6 Regional Hospitals and Tertiary Education

Improve, increase and enhance sustainable connectivity of regional hospitals and tertiary education. Support development of active travel and public transport connectivity for new Monklands hospital and other future hospital and tertiary education development.

Question 137. Do you support this policy?

- Yes

Question 138. Please provide comments on this individual policy:

Current active travel links, especially cycling facilities are lacking within certain hospitals and schools. Cycling Scotland's Cycling Friendly programme already supports organisations and education facilities to increase facilities, training and storage for bikes and we continue to work in partnership to increase this. Often barriers such as access to bikes, training and facilities can stop key workers, staff, and students from participating in cycling, and it is vital that this area is considered in order to achieve the modal shift.

Policy: P.CP7 Housing Development

Facilitate and support increased and enhanced active travel and public transport connectivity of major residential development and growth areas in the region.

Question 139. Do you support this policy?

- Yes

Question 140. Please provide comments on this individual policy:

Current active travel links towards new residential housing being built, as well as cycling storage could be improved. Cycling Scotland's social housing partnership fund programme already supports social housing providers and we would be open to sharing results and discussing the possibility of this to support more residential cycling projects and facilities.

Question 141. What are your views on transport governance in the west of Scotland? Is the right framework in place to deliver the vision and objectives of the Draft RTS?

- Yes

Question 144. What are your views on how we pay for transport in future – from level of fares on public transport, through to road pricing / congestion charging? What changes, if any, would you like to see made?

We would welcome a study and trial into congestion charging as well as workplace levy as vehicles do not cover the many external costs generated from crashes, congestion and environmental pollution.

Question 145. Are there any other monitoring indicators that should be included in the Monitoring and Evaluation Framework?

- Yes

Question 146. Please describe these indicators including data sources.

Our National Monitoring Framework (of permanent and temporary counters) and our Cycling Open Data Portal can be used to monitor cycling journeys in the SPT region and the difference that interventions have made. Additionally, the Annual Cycling Monitoring Report tracks and reports on cycling rates within local authority areas.