

## **Scotland's Draft National Transport Strategy**

### **A response from Cycling UK in Scotland**

The NTS2 documentation can be found here <https://www.transport.gov.scot/our-approach/national-transport-strategy/>

### **Consultation Questions and suggested answers**

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

Yes

Cycling UK in Scotland believes that this is a very positive vision for the next 20 years. The goal of a sustainable, inclusive and accessible transport system for Scotland is very welcome.

The second part of the Vision would be improved by the inclusion of the words 'all' and 'people' as follows: 'for all people, communities, businesses, and visitors.' In its current form it doesn't reflect that the NTS2 must work for individual people as well as communities, for example the Strategy is for individual disabled people who struggle to access public transport as much as it is for communities.

We believe that the Scottish Government must aim to achieve the NTS2 Vision well before the 20-year life of the strategy. The urgent challenges within the draft strategy, the Climate Emergency, the new target to reduce GHG emissions by 75% by 2030 all require a speedy delivery of the Strategy and therefore by 2030 Scotland must be well on the way to delivering the Vision, Priorities and Outcomes.

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

Yes

We believe that the 4 Priorities and 12 Outcomes are welcome and cover the right themes - the NTS2 must: promote equality; take action on climate change to help us adapt and help deliver a net-zero target; and improve our national health and wellbeing. Along with the Vision these Priorities and Outcomes are important as they set the set the focus of investment decision-making, development of an action plan and direction of projects for the coming years. Future projects must aim to meet these Priorities.

However, the Outcomes do not satisfy the dictionary definition of an outcome – *‘The outcome of an activity, process, or situation is the situation that exists at the end of it’*<sup>1</sup>. Rather these are aims or aspirations. We would like the final NTS2 to give more prominence given to the Outcomes and Impacts outlined in the Enablers Assessment Technical Report which show more clearly what Government is aiming to achieve through the Strategy process.

In its current form, the Outcome ‘promotes greener cleaner choices’ the word ‘promotes’ should be substituted with the word ‘enables’. This is to show that the process must drive change not simple signpost alternative options.

## **2b. Are some of these Priorities and Outcomes more important than others or are they equally important?**

We believe that addressing the challenge of the Climate Emergency is the highest priority for Government at this time and for the decades to come. This means that all Scottish Government policy and Strategy should aim to fully and urgently address this challenge. The NTS2 is no exception, and therefore the Priority to ‘Take Climate Action’ is more important and urgent than all the others because if we do not take climate action in the transport sector and do not achieve Scotland’s net-zero target for GHGs we put at risk all the other Priorities and benefits that come from achieving them (Health, Equality and Economy). However, taking climate action itself needs to be achieved in a sustainable way that does not compromise the other Priorities.

For Cycling UK in Scotland, the 3 Priorities of; Promote Equality, Takes Climate Action, and Improves our Health and Wellbeing, are more important and urgent as a priority than Helps our Economy Prosper. The Priority of ‘Helps our Economy Prosper’ has seen much focus and investment in the past as evidenced by the huge road and rail investment programme in STRP1. Transport policy in the past has been heavily focussed on the Outcome ‘Will get us where we need to get to’. Transport Scotland therefore must change from within to deliver the new NTS2 Strategic approach and to meet its many new Priorities and Outcomes. The approach of the past is no longer fit for purpose. Delivery of all the Priorities need to be balanced and delivery of one priority can support another.

Cycling UK in Scotland recommends that the Priority of ‘Helps the Economy Prosper’ should focus on sustainable economic growth rather than sustained economic growth. Making the economy prosper in a sustainable way will improve indicators for the other Priorities, e.g. by doing so it will reduce GHG emissions, and will improve health and wellbeing.

## **3. Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on?**

This section of the draft NTS2 does well to comprehensively outline, in an easy to read way, the challenges facing Scotland. However, the final NTS2 does not prioritise the challenges, provide enough detail on the scale of the challenges, or identify where challenges can be tackled together.

We strongly recommend that the NTS2 describes the scale of each of the challenges and perhaps ranks or categorises them. For example, the global climate emergency and the challenge of reducing single occupancy car use is a much bigger challenge than the challenge of improving reliability on the rail network.

We recommend that the NTS2 indicates which challenges are shared challenges across government departments and which are the role of Transport Scotland alone to address. Furthermore, we recommend that the NTS2 identifies where challenges join with each other and can therefore be

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<sup>1</sup> <https://www.collinsdictionary.com/dictionary/english/outcome>

tackled together – for example, measures to increase the number of people cycling to tackle increased road traffic, congestion, air quality and physical inactivity.

Cycling UK in Scotland recommends that the challenges section must be made clearer. We want to see actual trends included, for example, information about the Accessible Travel Framework is not a trend. Real data, such as from the Transport and Travel in Scotland – results from the Scottish Household Survey - 2018. We also recommend that some of the Challenge section subtitles should be re-written as challenges – for example Ageing Population is not a challenge but ‘meeting the needs of an ageing population’ is a challenge to be addressed in the NTS2. Furthermore, some challenges need to better explain and expand upon the challenge, again the Ageing Population challenges explains about issues of inaccessibility only briefly and near to the end of the section.

A key challenge, missing in the draft NTS2 is that of ensuring that active travel infrastructure is designed holistically, with the needs of everyone, particularly the most disadvantaged in mind, e.g. children and the disabled. The way our community spaces, paths, pavements, cycle lanes etc are designed must allow people to walk and cycle safely and with confidence that they will be safe.

#### **4a. Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?**

The number and extent of the challenges show that a radical overhaul of transport strategy and policies is needed in Scotland, rather than limited improvements or tinkering. **Taken as a whole the draft NTS policies do not provide reassurance that Government is aiming for a radical overhaul. We recommend much clearer, stronger, ambitious, and well-developed policies.**

Cycling and Active Travel is poorly supported in the draft Strategy. The NTS2 must include specific policies aimed at enabling more cycling and active travel. Three of the Enablers (30, 31 & 33) are aimed at active travel or sustainable modes of transport but cycling itself is not specifically mentioned. We believe this is insufficient for an issue which is identified as a significant challenge in the document.

#### Meeting the challenges

There is no information in the draft NTS2 document to show which policies are being used to meet the challenges – instead this is to be found in the Enablers Assessment Technical Report. We strongly recommend more information in the final NTS2 showing which challenges each policy is aiming to address.

The challenge of Demand Management is not well met in the Policies – the challenge of reducing car numbers on the roads and reducing single occupancy cars is not addressed fully in the NTS2 list of policies. This particularly applies to our towns and cities. This is a huge issue, as shown in the challenges section through the statistics and infographics. Solving this challenge would have multiple benefits and help meet many of the Priorities and Outcomes. The NTS2 must include more policies and actions to address this.

#### Fulfilling the Priorities and Outcomes

There is no information in the draft document showing how each policy will help to meet a Priority and Outcome. Again, this is to be found in the Enablers Assessment Technical Report. It is, however, very difficult to know if these are the right policies to meet them or, more importantly, to realise the radical overhaul of transport policy needed to solve the challenges.

We believe that there are insufficient policies to meet the ‘Promotes equality’ Priority.

We recommend the NTS2 includes more information on how each policy will be measured – especially, indicators of success. In some cases the policies need a target to indicate how much change Government is aiming to achieve over the length of the Strategy. Policies and Enablers should be consistently written and in the SMART style as far as possible – Specific, Measurable, Achievable, Realistic, Timebound.

**4b. Are some of these policies more important than others or are they equally important?**

Please provide details.

Yes.

We strongly recommend more information in the NTS2 indicating which are the priority policies. This is needed for the public to understand how limited funding will be deployed in future.

We believe that policies which halt or reverse things that are wrong in society are priorities, for example, those that reduce negative environmental impacts, turn around poor health indicators or reverse inequalities. These policies are more important in the NTS2 than, for example, Policy K ‘Support the transport industry in meeting current and future employment and skills needs’.

Cycling UK In Scotland believes that the following Policies are the highest priority and most important because of the scale of the challenge and the urgency of the change needed:

- Policy M - Reduce the transport sector’s emissions to support our national objectives on air quality and climate change
- Policy I - Provide a transport system that is equally accessible for all
- Policy A - Continue to improve the reliability, safety and resilience of our transport system
- Policy B - Embed the implications for transport in spatial planning and land use decision making
- Policy N - Plan our transport system to cope with the effects of climate change.

Policies which address multiple challenges or fulfil multiple outcomes are also most important. These must be identified and prioritised in the NTS2.

**5a. Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?** Please explain your answer, by providing examples of where you believe transport related decisions should be taken.

Cycling UK in Scotland recognises that a transformation of the transport sector and how we move around needs action and tough decisions made at all levels – national, regional and local. However, the right balance of decision-making needs to be found that facilitates the changes needed at the pace required to address the Climate Emergency and the health crisis in Scotland. Urgent action on transport, including the delivery of active travel infrastructure, is needed, and to truly move Scotland to the Sustainable Transport Hierarchy shown in the draft NTS2. For example, huge amounts of money need to be shifted from road infrastructure spending to cycling and walking infrastructure and to public transport.

To make the above happen smoothly and quickly the right processes need to be in place. This will mean that the way things have been done in the past will need to change too.

We strongly believe that national and regional decisions regarding measures to deliver sustainable transport projects and infrastructure must not be overcome by a vocal minority of views at a local level. As a hypothetical example, a new segregated cycle lane planned for Greenock at a national strategic level, must not be challengeable in principle by local residents or businesses. However, at a local scale a 'bottom up' approach using local knowledge to improve delivery (rather than hinder) will be beneficial and should be facilitated.

We specifically want to see Regional Transport Partnerships work with the Local Authorities in their regions to plan and deliver regional cycle networks. For example, a plan to deliver segregated cycle lanes along arterial routes into Glasgow will require Glasgow City Council to work with East Renfrewshire Council, South Lanarkshire Council etc, to ensure continuous cycle highways from the outer edges of Greater Glasgow into the centre.

**5b. Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?** Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.

Cycling UK in Scotland has no comment to make on this question.

**6. Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?**

No

Cycling UK in Scotland believes that the draft NTS2 does NOT fully address the needs of all transport users. We want to see detailed policies and more action that explicitly address challenges of; 1) rural transport in a different way to policies which affect urban transportation, 2) helping the most disadvantaged members of society, wherever they are in Scotland, to access, use and benefit from transport as easily as anyone else, 3) making communities great places to live.

**7a. What aspects of the transport system work well at the moment?**

Cycling UK in Scotland has a specific interest on enabling cycling in Scotland. We aim to celebrate what works well and build on it. The following aspect work well for cycling at the moment:

- Segregated cycle lanes – Because these lanes are separated from traffic they are safer and more enjoyable for cyclists to use.
- 20mph zones – Where these have been put in place in residential areas they work well and help to reduce traffic speeds. In Edinburgh, average speeds have dropped in areas which have introduced there 20mph limits and acceptability of the zones by the public has increased<sup>2</sup>.

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[http://www.edinburgh.gov.uk/news/article/2748/evaluation\\_shows\\_positive\\_impact\\_of\\_20mph\\_in\\_edinburgh](http://www.edinburgh.gov.uk/news/article/2748/evaluation_shows_positive_impact_of_20mph_in_edinburgh)

- Traffic calming measures – These targeted measures to reduce traffic speeds are welcome, especially those designed to be cycle friendly<sup>3</sup>.
- Off road cycle tracks and the National Cycle Network (NCN) – Scotland has excellent rights of way legislation which supports off road and rural cycling opportunities.
- Behaviour change projects – Cycling UK in Scotland and other organisations deliver high quality projects which give people the skills and confidence to start cycling or return to cycling.<sup>4</sup> These projects benefit from Transport Scotland funding.
- Ease of taking bicycles on Calmac ferries – taking bike on Calmac ferries is currently relatively hassle-free.
- Cycle storage space on new Class 385 train services between Glasgow and Edinburgh – Cycling UK welcomes the new Class 385 trains because they have more cycle storage space than the previously used types/class of trains.

**7b. What practical actions would you like to see the National Transport Strategy take to encourage and promote these?**

- Segregated cycle routes along arterial routes into all towns and cities – Segregated lanes or tracks provide physical separation from traffic and thereby increase safety. There are different ways to provide segregation depending on the situation and budget<sup>5</sup>. Revenue funding must be increased for Local Authorities to maintain an expanded network of cycle paths.
- NCN expansion – we would like to see the popularity of the NCN built on through an expansion programme to create more routes and more links between routes, especially in rural areas. With an increased capital budget there must also be a large revenue budget for the NCN to ensure the NCN is maintained.
- Longer funding periods for behaviour change projects - Multi-year active travel funding gives security for Local Authorities and partner organisations to deliver much needed behaviour change work.
- 20mph speed limits for all residential areas – We strongly recommend that Government commits to setting 20mph limits in all residential areas<sup>6</sup>.
- More space for bikes on trains – We want to see further improvements to the fleet of trains in Scotland to boost the capacity of trains to carry bikes and improved booking systems.<sup>7</sup>

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

Cycling UK in Scotland can identify many things which do not work well with today's transport system. Many of them are highlighted as challenges in the NTS2 document. We highlight the following which particularly do not work well and discourage cycling in Scotland and need to be addressed in the NTS2:

- Funding for cycling – Funding for sustainable and active travel is £79m per year, approximately 3% of the transport budget, and is small compared with £833m on

<sup>3</sup> <https://www.cyclinguk.org/campaigning/views-and-briefings/traffic-calming>

<sup>4</sup> <https://www.cyclinguk.org/scotland>

<sup>5</sup>

[https://www.cyclinguk.org/sites/default/files/document/2017/10/space\\_for\\_cycling\\_guide\\_for\\_decision\\_makers.pdf](https://www.cyclinguk.org/sites/default/files/document/2017/10/space_for_cycling_guide_for_decision_makers.pdf)

<sup>6</sup> <https://www.cyclinguk.org/news/why-were-urging-scottish-government-adopt-20mph-limit-urban-areas>

<sup>7</sup> <https://www.cyclinguk.org/campaigning/views-and-briefings/taking-cycles-on-trains>

Motorways and Highways in Scotland<sup>8</sup>. There is an abiding legacy of Government funding and strategy which perpetuates the dominance of and reliance on private cars and vehicles powered by fossil fuels. **The NTS2 must break this dominance if it is to achieve the NTS2 Vision and Priorities.**

- Linking of cycle lanes into a coherent and safe network – Often cycle lanes are not continuous and end abruptly; many cycle lanes are Advisory Cycle Lanes (marked by a dashed white line); and the law on parking in a mandatory cycle lane does not match the Highway Code and is largely unenforceable<sup>9</sup>
- Shared space paths – Shared space paths where cycle lanes and footways share the same space or are adjacent can be dangerous for vulnerable pedestrian users, such as blind people or older people<sup>10</sup>.
- Inequality in bike access - Only 35% of households in Scotland had access to a bike in 2018, with lowest levels amongst those on low incomes. This can mean people on low incomes have no option other than potentially unaffordable car ownership or increasingly expensive public transport, denying people the benefits of healthy travel.
- Public transport – public transport is often expensive, infrequent and unreliable – as identified in the NTS2 challenges section. This situation means people continue to use private transport even when public services are in place.
- Insufficient cycle space on trains – The majority of trains have too few bike spaces and there is an inconsistent approach to booking bikes on trains in Scotland, depending on the service or type of train.
- Lack of incentives to use sustainable transport alternatives to the car - even where there are good public transport services and sustainable travel alternatives, car use remains high for a number of reasons. One reason is the availability of large volumes of free or relatively cheap parking spaces in towns and cities, and out of town retail centres.

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

Cycling UK in Scotland recommends that the NTS2 includes an action plan that aims to deliver the final NTS policies and strongly influences the forthcoming STPR2.

Cycling UK in Scotland contributed to and endorses the *Priorities for the National Transport Strategy* document. This is a set of practical actions for an NTS2 action plan that Active Travel partner organisations agree need to be prioritised.

We recommend that the NTS Action Plan must include the following practical actions to address the issues we highlight in answer to question 8a and to encourage cycling:

##### Action to reduce reliance on the car

Vienna, Stockholm and Frieberg in Germany are all cities which have successfully cut car use and have shown other cities how their examples can be followed<sup>11</sup>. In Frieberg car use was cut from 60%

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<sup>8</sup> <https://www.gov.scot/publications/scottish-budget-2019-20/pages/12/>

<sup>9</sup> <https://www.cyclinguk.org/blog/underhand-law-change-undermines-mandatory-cycle-lanes>

<sup>10</sup> <https://www.rnib.org.uk/campaigning/current-campaigns/shared-space>

<sup>11</sup> [https://ec.europa.eu/transport/sites/transport/files/cycling-guidance/mimosa\\_enabling\\_cycling\\_cities.pdf](https://ec.europa.eu/transport/sites/transport/files/cycling-guidance/mimosa_enabling_cycling_cities.pdf)

in 1976 to 34% in 2010<sup>12</sup>. Demand management measures are needed for our towns and cities to create modal shift. In Scotland we believe the following are needed:

- Rebalancing Government transport spending, from national to local roads, and from building new road capacity to maintaining the existing network.
- A pause on increasing trunk road capacity in Scotland.
- Introduce a national road traffic reduction policy and strategy.
- More pedestrianisation and car free city centres.
- Encourage Local Authorities to use the enabling powers already in place in Scotland for Road User Charging, Low Emission Zones, and Workplace Parking Levy.
- Introduce Private Non-Residential Parking Levy legislation<sup>13</sup>.

#### Action to encourage cycling

We want to see more people cycling in Scotland but this requires targeted investment and policy. We want to see the following in an NTS action plan:

- Sufficient funding for active travel – 10% of the transport budget to be spent on active travel nationally and locally.
- Scotland's roads and neighbourhoods redesigned to include cycling and walking infrastructure appropriate for all ages and abilities to benefit from.
- Cycling prioritised in local transport strategies
- Bike buses for rural areas – more buses with dedicated space for bikes<sup>14</sup>, or fitted with external bus bike racks or trailers – to encourage cycling in rural areas by local people and tourists.
- Zero-interest loans to improve access to bikes and adapted bikes – to makes bikes affordable, increase access to bikes for all households and to disadvantaged members of society.
- Safe bike storage and bike parking. – increase safe bike storage spaces at transport hubs, such as bus stations and train stations, but also in workplaces and in residential developments, such as flats and tenements.

#### Action to promote public transport

- More cities and towns introducing public bike share schemes, including shared e-bikes.
- An integrated or smart ticketing system for public transport use throughout Scotland, which includes use of public bike share schemes
- Free bus services in towns and cities.
- Segregated cycle lanes along arterial routes into all towns and cities.

#### Action to increase active travel provision where people live

High quality cycling and active travel infrastructure must be planned and included in designs at the outset of all developments, rather than squeezing in poorly planned paths in at the end as an afterthought).

- Prioritising active travel infrastructure in land use options appraisals and as a statutory part of planning consent.

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<sup>12</sup> <http://www.scotlink.org/files/publication/other/LINKSLUCaseStudies2010.pdf>

<sup>13</sup> <https://foe.scot/wp-content/uploads/2019/02/Workplace-Parking-Levy-Letter-to-Party-Leaders.pdf>

<sup>14</sup> <https://www.cyclinguk.org/campaigning/views-and-briefings/buses-and-coaches>



- Compulsory purchase legislation for active travel infrastructure.
- Cycle paths and cycle storage planned into all housing and business developments from the start.

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

- Increasing Accountability – A place-based approach is needed to find the best solution for regional decision making. For example, the final approach may well be different for the Greater Glasgow area compared to the Borders.
- Strengthening evidence – A solid set of indicators is needed to judge the progress of the NTS2. Indicators are needed to indicate when success is achieved and this is difficult without the NTS2 setting targets or making Priorities or policies SMART. Some of the indicators are the wrong indicators for the outcome, for example, indicator 5. ‘Proportion of petrol, diesel and EV cars and vans registrations’ is not an indicator of how well we adapt to climate change impacts. In addition, in some cases one or two indicators as listed will not be sufficient to assess whether the Outcome has been met.
- Managing Demand – The inclusion of the Sustainable Transport Hierarchy is welcomed, however this should be prominent and at the top of the document rather than near the end. The Hierarchy needs to be applied to existing projects and influence investment on new projects or spending.

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

In Summary:

- The draft NTS2 has an excellent Vision for the next 20 years and good Priorities and Outcome themes under this. The NTS2 must include more specific policies which are clearly linked to show how they address the challenges, or meet the needs, and how they fulfil the Priorities and Outcomes – to ensure they are guided by strategy.
- Specific policies are needed to ensure there is an increase in active travel in Scotland – walking, cycling and wheeling.
- It is good to see the need for demand management highlighted and the Sustainable Transport Hierarchy within the document. However, the NTS2 needs to be ambitious, show radical thinking, and include specific policies to make system change happen. Only radical change in policy and strategic direction will enable people to get out of their cars and cycle, walk or use public transport.
- Cycling UK in Scotland contributed to and endorses the Priorities for the National Transport Strategy document. This is a set of practical actions for an NTS2 action plan that Active Travel partner organisations agree need to be prioritised.

**Questions 11 – 14 are about the Strategic Environmental Assessment.**

*Cycling UK is not able to answer questions on the SEA.*