



NTS Review Team Transport Scotland

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Dear Sir/Madam,

Scottish Government National Transport Strategy

Thank you for the opportunity to comment on the proposed Scottish Government Transport Strategy.

GoBike is a voluntary organisation campaigning primarily in the Glasgow travel-to-work area. GoBike campaigns for better infrastructure, policy and political support for cycling to become the local travel mode of choice for people of all ages and abilities. For that to become a reality it must appear that cycling from anywhere to anywhere is safe, convenient, attractive and direct. GoBike members use a range of types of cycle for transport (for commuting, shopping, travelling with small children), for leisure, for becoming or staying healthy and fit, and for fun. GoBike campaigns not primarily for the benefit of its members but for the far greater numbers of people for whom cycling just does not seem a real choice in current road conditions.

The comments which follow are made in the context of GoBike's campaign aims, and are informed mainly by the experiences of GoBike members in Glasgow and its immediate area. The intention of this response is to contribute to a Transport Strategy which is more likely to achieve the benefits discussed in the narrative sections of the draft document.

1. Is the vision the right one for transport policy over the next 20 years?

Broadly. For avoidance of doubt there should be an explicit statement that the aim of the strategy is to provide a transport system which is effective (i.e. good at letting people and things move from A to B). GoBike strongly supports the aim of having one which, in the form of words used in the draft strategy (p 60), is sustainable and supports wider outcomes.

2a. Are the (four) priorities and outcomes (three per priority) the right ones?

Yes with caveats. GoBike supports the four priorities as aims for society. But the priority for a transport strategy has to be enabling people and things to move around while supporting wider aims. As the draft strategy states (p 9), 'People ... will want ... the transport system ... to provide the fundamental function of linking people and places in ways that are reliable, affordable and safe'.

If the priorities are kept, the strategy needs to be straightforward about the trade-offs among them which will always require difficult political decisions. The most obvious example is that there are many people who sincerely believe that a strategy that 'helps our economy prosper' is synonymous with enabling more and faster driving, a direct conflict with one which 'takes climate action' and 'improves our health and wellbeing'.

To be effective the strategy must provide a clear framework for future policy and decision making, rather than creating an arena for horse-trading.

The three bullet points listed under each priority are not formulated as outcomes. They are more like aspirations, all desirable, but in the form written seem too general to be useful in forming future policies or guidance, or in proper evaluation of the success of those policies.

2b Are some of the priorities more important than others?

Yes. The priorities differ in nature. There is limited agreement on the policy levers that will promote equality or lead to a prosperous economy. But there is now general agreement that the increasing proportion of journeys made by car and of single occupancy car trips (p 22) is a problem for climate change. There is also general agreement that increasing people's activity levels will benefit both individuals and society generally, and that one of the most effective ways of securing better levels of activity is to change the means of everyday travel to walking and cycling (p 43).

The Transport Strategy must set clear policies to reduce car use where this is most achievable, i.e., in built-up areas.

3. Are the challenges the strategy highlights the key challenges?

Not really. Chapter 3 provides a long (pp 12 to 46) and interesting discussion of many issues which are important for us to address as a society. But not many are specifically transport matters. It's also tactless at best to set up a list of 'challenges', and then include as headings 'Ageing population' and 'Disabled people'.

GoBike submits that the headings listed under 'Challenges' are all matters on which the Transport Strategy needs to have a positive effect, but the majority of them will primarily be addressed by policies in other areas.

The paragraph at the head of the draft's list of 'challenges' (p12) perhaps offers a more useful summary of the challenges facing Scotland's transport system.

- Many people encounter problems when trying to access the services they need
- Businesses face congestion and delays when reaching their customers
- Vehicles continue to emit greenhouse gases and pollute the places we live and work.

To these can be added:

- The proportion of all journeys made by car is increasing, as is the proportion of single occupancy car trips (p 22)
- The majority of emissions of nitrogen oxides are by road transport, and are not reducing at the expected rate (p 26)
- Bus use is in decline (p 28)
- Congestion is increasing (p 39)

4a. Are the (14) policies the right ones to deliver the Priorities and Outcomes?

No. It's stated that the policies are intended to achieve the outcomes, and the enablers are described as representing mechanisms for delivering the high level policies (p 47).

What's unclear is the status of the intervening narrative (i.e. pp 9-46). This contains many examples of what read like statements of intent which are hard or impossible to find represented in the policies and enablers. Examples of interest to GoBike are:

- We will not be building infrastructure to support forecast demand [by motor traffic inferred] – we will reduce the need to travel by unsustainable modes in line with the Sustainable Travel Hierarchy. (p 9).
- Scotland's transport system will be designed with sufficient walking and cycling options to help us become a healthier nation (p 9).
- Good active travel facilities provide opportunities for recreation for people ... to enhance their health and wellbeing (p 14, addressing *Social Isolation*).

- Due to ... congestion ... there is a growing recognition of the need to tackle the volume of vehicles through measures to effectively manage demand and encourage more sustainable travel options (p 19, under *Cities and Towns*).
- The graphic showing *bus circles of decline and growth* (p 29 under *Decline in Bus Use*) shows what needs to happen.
- The continued application of the Sustainable Travel Hierarchy will see a significant reduction in emissions (p 23, under *Global Climate Emergency*).
- The bad effects of last-mile HGV deliveries are recognised (p 35)
- We want to accommodate the increasing demand for walking and cycling tourism (p 36)
- The transport system can ... help ensure that places are convenient to get to without the use of a car (p 40, under *Spatial Planning*).
- Not taking steps to effectively manage demand for car use is no longer an option. We need to consider alternatives that encourage single occupancy drivers to shift, whenever possible, from making their journeys by car. (p 40, under *Reliability and Demand Management*).
- Dedicated walking and cycling infrastructure must also be maintained to encourage use (p 46 under *Resilience*).

Observations like the above need to lead to unambiguous policy statements.

For example, when designing roads and streets (including making small changes) local authorities and Transport Scotland should be required to apply firstly the Sustainable Travel Hierarchy, secondly *Designing Streets* (a Scottish Government policy document for nearly a decade) and then the relevant technical/engineering design guidance. Designers and engineers can use their creativity and problem-solving skills to find solutions whenever this seems challenging.

Provision for cycling must be made which does not make things worse for other vulnerable users of the streets.

Standards for cycle infrastructure are a moving target; rather than spending resources on writing Scottish guidelines a commitment should be made to following developing best practice

Action must be taken to reduce the number of local car journeys, particularly those with just the driver. There are many good examples of how to do this in other world cities

Observations on individual proposed policies:

Embed implications for transport in spatial planning and land use decision making	GoBike supports changes to planning policy which limit further suburban sprawl. New developments should be at densities which allow local services to be within distances that are practical and appealing for walking and cycling, and which make public transport viable.
Provide a high-quality transport system that integrates Scotland...	GoBike supports a system that provides integrated end-to-end journeys, with emphasis on ease of making part of longer journeys by bike, and ease and reliability of taking bikes on trains and buses.
Embrace transport innovation that positively impacts on our society, environment and economy	How is the judgement of what is a 'beneficial transport innovation' to be made? GoBike cautions against uncritical welcoming of electric cars. Electric cars cause the same congestion as conventional ones and the air pollution from brakes and tyres is the same. The provision of on-street charging points goes against the policy of reducing on-street

	parking and footway clutter.
Provide a transport system which promotes and facilitates travel choices which help improve people's health and wellbeing	The Sustainable Travel Hierarchy is prominent in the narrative section. Its adoption as policy by Local Authorities and Transport Scotland is essential
Reduce the transport sector's emissions...	

4b. Are some policies more important than others?

Policies to reduce the attractiveness of single-occupant car journeys (particularly in towns and cities) and increase the attractiveness of the streets for people moving under their own power (they're the same policies) will address problems of air quality, population activity and health, and those caused for the remaining essential drivers (commercial, personal or buses) by congestion.

5a. Are there specific decisions about transport in Scotland that are best taken at national level, at regional level, or at local level?

For the large urban centres (e.g. Glasgow) land use decisions taken in the surrounding areas have an impact on the choices people then make for travelling to the urban centre. Sprawling ('leafy') suburbs with limited local services of their own mean people will want to drive to metropolitan centres. If car use in urban centres is to be reduced as it obviously needs to be, land use decisions need to be co-ordinated regionally.

All relevant authorities need to work together to provide and maintain cycle infrastructure on arterial routes.

A body for a trunk cycle network analogous to Transport Scotland for roads would make high quality long distance routes more achievable.

5b. Should local communities be involved in making decisions about transport in Scotland?

Experience has shown that when there are groups of people whose perception is that their lives will be spoiled by a proposed change their vociferous objections can derail a project that would have longer term benefits for a more dispersed group of people. Local communities should definitely be involved in decisions which affect them.

However the cost of community engagement on every change to neighbourhood infrastructure is too high. The Transport Strategy needs to have clear aims of decreasing car use and encouraging active travel which are 'sold' at a national level. Then the local debate could be limited to the detail of how the changes will be made at a community level, rather than whether they will be made.

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?

GoBike has no comment.

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

Recent positive changes include:

- Announcement in 2017 of the doubling of spending on cycling (though limited to the duration of the parliament).
- Policy of generally allowing contraflow cycling in one-way streets (though there are proving to be obstacles in getting the policy implemented).
- Enabling local authorities to apply a Workplace Parking Levy.
- Action against parking which obstructs pavements.

- Construction in Glasgow of high spec (even allowing for some design problems) segregated infrastructure for cycle traffic.
- Low Emissions Zones.
- Spread of 20 mph speed limits.
- Reinstatement of abandoned railway routes (Airdrie/Bathgate, Borders).
- Improvements to rail rolling stock (though it appears the ability to take bikes on trains may become even more limited).

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

- Local authorities should be required to dedicate an ongoing minimum (and not minimal) percentage of their transport budget to infrastructure for cycle traffic. It's clear that they need the ability to plan a coherent long term programme of work and to build up in-house skills and experience instead of being constrained by the current stop-start project-based approach.
- Implementation of policy (e.g. contraflow cycling in one-way streets) cannot be left to the discretion of local officers. The weasel words 'where possible' must be interpreted as 'make it possible' and not that a policy may be ignored because it is not easy to implement.
- Designers of cycling infrastructure must be able to learn from the best in the world in order to create facilities which are safe for everyone.
- 20 mph limits will be more effective and more straightforward for drivers when implemented over wider areas and not street-by-street as is happening in Glasgow
- Further reinstatement of railway routes and stations (Borders to Hawick/Carlisle, Larkhall to Stonehouse/Strathaven, Gorbals, Ibrox, Finnieston, Parkhead) and double tracking where hold-ups cause knock-on delays (Borders, Milngavie)
- Proper trials of the mechanisms for loading bikes onto trains, and the development of multi-purpose spaces in carriages.

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

- Glasgow has the sustainable transport hierarchy written into policy for new developments and major redevelopments. Yet it has proved impossible to get it implemented, for example, on University Avenue, the route through Glasgow University's major redevelopment of the Western Infirmary site.
- Project-by-project funding for infrastructure for cycle traffic leads to fragmented development (some on routes where proper analysis would show it to be unnecessary) and limits the ability to grow a reservoir of skills and expertise.
- Essential provision of cycle traffic infrastructure on arterial routes is limited by local authority boundaries and unwillingness to take road space from motor traffic.
- Details of the design of dedicated cycling infrastructure are causing problems for other vulnerable people, particularly wheelchair users and those with impaired vision.
- A mindset in which infrastructure for cycle traffic is treated as distinct from the design of streets is causing problems managing interactions at side roads and junctions. It also blocks the obvious insight that segregated infrastructure is not needed or possible on all roads. Streets in the cores and residential areas of towns and cities must be designed so that driving is limited and people moving under their own power clearly have priority.
- Failure to follow the principles set out in *Designing Streets* means that changes are still being made to streets and junctions which encourage drivers to dominate all other users, e.g. new turnings created with wide flaring corners, allowing drivers to turn at high speeds.

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

- Require transport spending (construction and maintenance) to have the same priorities as the Sustainable Transport Hierarchy.

- Require all new developments and all changes to existing streets and roads to follow the Sustainable Transport Hierarchy then the principles of *Designing Streets* and after that the relevant technical guidance.
 - Ensure that training and CPD for road engineers and designers reflect policy priorities.
 - Ensure local authorities have the power to set the maximum allowable size of trucks in urban area, and that they use it.
 - Provide a way for experimental changes to be made with reduced administrative overhead.
9. Anything to say about Increasing Accountability, Strengthening Evidence and Managing Demand?
- The strategy must be much clearer and more assertive about the need to ‘manage demand’, which, from the figures given within the draft itself, must mean enticing people out of their cars by making alternative modes more attractive in comparison. This will be politically difficult, but the opportunity is greater now than at any time in the past because of the growing acknowledgement of the need to ‘do something’ about climate change and about population health.
 - Acknowledge the evidence that ‘traffic induction’ and ‘traffic evaporation’ are real phenomena.
 - The current version of the *Headline indicators* (Annex A) does need to be smarter (in all senses).
10. Anything else?
- The coming widespread adoption of electric vehicles raises many questions which transport strategy for the next 20 years must be able to answer.
- One reason the use of cars continues to increase is that its marginal cost is low. With the marginal cost of the use of an electric car currently much lower their use, once acquired, will be even more attractive.
 - Streets clogged with electric vehicles will score just as low on the *Place standard tool*, advocated by the *Place principle* (p 55), as those clogged with conventional ones. The use of electric cars may remove some of the air pollution due to vehicles, but will not contribute to other desirable outcomes.
 - Unless a way of charging petrol-like prices for recharging electric cars is found (soon, before their low cost of use becomes embedded as an entitlement), a way of replacing the government’s take from fuel duty will have to be found within the timeframe of this strategy.

Yours sincerely



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