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EDINBURGH

Consultation Response from the Royal College of Physicians of Edinburgh to the Transport Scotland consultation on the Cycling framework for active travel.

[Cycling Framework for Active Travel](#)

1 Do you agree with the above statement of strategic priorities for driving the development of cycling for transport in Scotland?

Please select only one item

Q **yes**

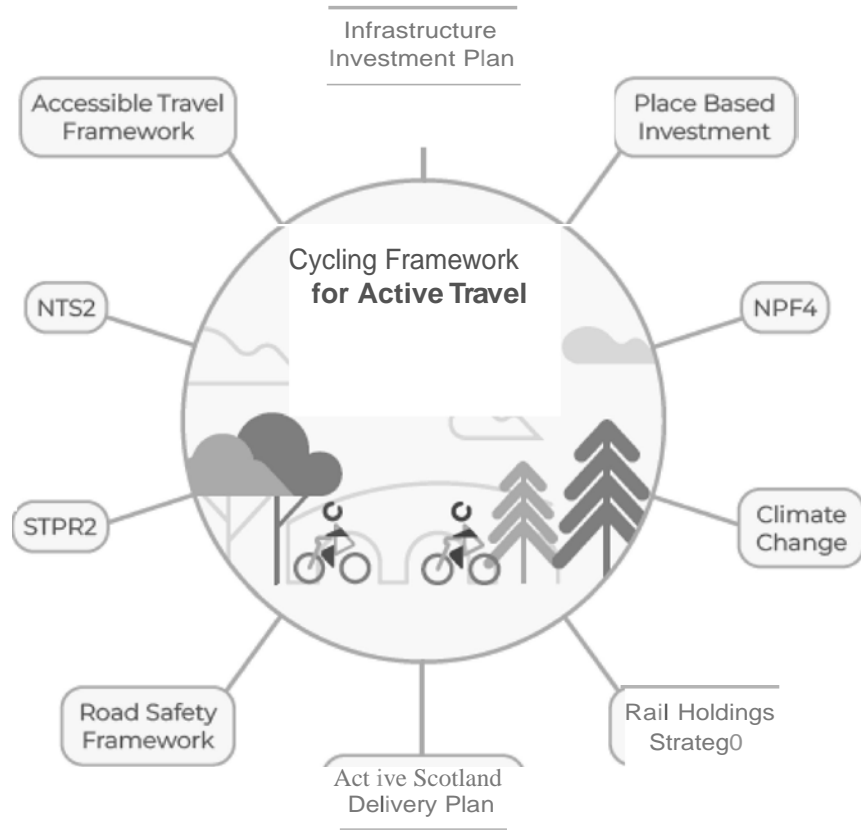
Q No

The Royal College of Physicians of Edinburgh (RCPE) is pleased to respond to this consultation. We are generally supportive of the strategic priorities set out and wish to stress the very significant health benefits cycling can lead to as well as the associated reduced costs to the NHS, society and individual patients. We consider cycling to be a low-impact, aerobic exercise, important for heart and lung health and also for maintaining a healthy weight. We are also aware of evidence that regular cycling can help reduce anxiety, stress and depression. Some of the health benefits have been summarized effectively both in the development of this plan and in other places, for example by Sustrans¹.

Tackling air pollution is an extremely important public health issue for the RCPE and we consider that increased rates of cycle use as an alternative to the car brings wider health benefits from improved air quality as well as reduced road danger and increased community cohesion.

¹ [The health benefits of an active commute - Sustrans.org.uk](https://www.sustrans.org.uk)

Strategic Policy Links



NPF4 - National Planning Framework 4

STPR2 - Strategic Transport Projects Review 2

NTS2 - National Transport Strategy 2

2 The diagram above sets out how the Cycling Framework is aligned to the wider policy context. Do you agree that this captures the key policy linkages and/or should any policy areas be added or removed?

Please select only one item

Q Yes

Q No

Please comment below

The RCPE considers that this Cycling Framework sets out the wider policy context and interconnections effectively.

Delivery Plan - Strategic Themes

Safe Cycling Infrastructure

Deliver dedicated, high quality cycling infrastructure suitable for all

Embed cycling in the design and maintenance of our places and communities and prioritise user comfort and safety

Fair Access

Increase equity of access to cycles and cycling opportunities

Ensure modal integration across the transport network including adapted and non-standard cycles, e-cycles, cargo cycles and cycleshare

Network Planning

Prioritise investment based on local transport strategies

Map existing and planned networks to identify gaps and improve consistency of quality and implementation

Effective Resourcing

Provide long-term funding and resourcing for the delivery of infrastructure and supporting behaviour change programmes, informed by local transport strategies

Promote and support innovation across the sector

Training & Education

Ensure new infrastructure is supported by inclusive promotional programmes, cycling training and other complementary initiatives

Provide opportunities for all to learn to cycle from an early age into adulthood

Monitoring

Expand monitoring networks and align monitoring at local and national levels

Embed learning in future investment decisions

3 Six strategic themes have been identified based on stakeholder feedback, as above. These themes illustrate the overarching approach for cycling for transport in Scotland. Do you agree with these strategic themes as priority areas for action in this framework?

Please select only one item

Q Yes

Q No

The RCPE considers that the six strategic themes are appropriate.

In relation to a Safe Cycling Infrastructure, some Fellows stated that protected cycle routes along roads with a speed greater than 40mph should be separated by hedgerows to decrease air and noise pollution, prevent icing (with routes unlikely to be gritted) and make a more pleasant commute.

Delivery Plan - Safe Cycling Infrastructure

The Delivery Plan has been developed using the information gathered through the evidence base review, from stakeholder engagement and the Cycling Action Plan Scotland (CAPS) review.

The result is a series of actions for each of the strategic themes that have been identified in the Framework. The Delivery Plan outlines the actions that will be delivered during the timeframe of the Framework and identifies the stakeholders responsible for delivery, acknowledging that partnership working is essential to achieve our vision. The Delivery Plan distinguishes between short term actions that can be delivered quickly or where substantial work is already underway, medium term actions that will be delivered within the life of the framework and aspirational actions for the longer-term.

Delivery Plan - Safe Cycling Infrastructure

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Work with local authorities on creating active travel strategies to prioritise investment in the creation of a dense, coherent network of connected cycling infrastructure in every town and city that is segregated from traffic and integrated with public transport	Local Authorities	Transport Scotland, Sustrans, Regional Transport Partnerships (RTPs), ScotRail, Network Rail	Medium
Remove barriers to the fast implementation of cycling infrastructure, including through changes to the Traffic Regulation Order (TRO) process, and support the use of temporary and trial schemes	Transport Scotland	Society of Chief Officers of Transportation in Scotland (SCOTS), Local Authorities	Short
Make it safer to walk, cycle and wheel across and along the trunk road network, both where it passes through towns and villages and where it links two or more settlements	Transport Scotland, Operating Companies	Local Authorities	Short
Use the Scottish Government's compulsory purchase reform programme to consider whether powers to acquire land for the purposes of cycling infrastructure are fit for purpose	Transport Scotland, Scottish Government		Medium
Provide ongoing development and governance of co-produced design guidance, including mitigation of unintended impacts on vulnerable road users and that infrastructure is suitable for non-standard cycles	Transport Scotland	SCOTS, Sustrans	Short

Develop a national approach to the creation of quiet road/cycle friendly roads in rural areas with everyday journeys prioritised	Transport Scotland	RTPs, Local Authorities, Sustrans	Medium
Update design and asset management guidance to enable national, consistent principles of infrastructure	Transport Scotland	SCOTS, Sustrans	Long
Engage the business sector to embed active travel in wider corporate culture including through the use of cargo cycles as the normal choice for local deliveries	Sustrans, Local Authorities	Local Authorities, Freight Transport Association (FTA)	Short
Support communities to close roads to allow for community events such as Play Streets and Car Free Days and to transition successful schemes to more permanent arrangements	Local Authorities	Transport Scotland, Sustrans, Living Streets	Medium
Support the various deliverables set out in Scotland's Road Safety Framework 2030 https://www.transport.gov.scot/media/50339/road-safety-framework-2030-delivery-plan-final.pdf under its Active and Sustainable Travel Strategic Action, ensuring that road safety remains a key focus of active and sustainable travel in Scotland	Transport Scotland	Police Scotland, Local Authorities	Long

4 Do you have any comments on the substance of the delivery plan actions in this section?

The RCPE generally supports the aims of the delivery plan but understands that the challenge will be to ensure it is delivered effectively in all areas and in a consistent way.

5 Do you have any comments on the agencies identified to lead and support these actions?

The College considers that local authority implementation of these plans is a vital consideration. Fellows are aware that Scotland has some of the strongest air quality rules in the world yet has 39 Air Quality Management Areas (AQMAs). The key to the success of the plans is funding and enthusiasm from local authorities, some of whom can appear more interested in the needs of motorists; a carrot and stick approach may be required to ensure all local authorities help deliver these plans successfully.

6 Do you have any other comments on this section of the delivery plan?

Fellows were particularly concerned at the apparent lack of reference to community engagement in the roll out of the delivery plan. They consider that such engagement is essential and that local people need to both be involved and work constructively together with local authorities to ensure the success of the plans. Effective community engagement is considered vital to the success of the delivery plan and should be embedded throughout the delivery plan.

Some Fellows stated that they believed that **protected** cycle routes should be the words used in the delivery plan diagrams. They indicated that some studies had raised significant questions about the use of simple white lines on roads to mark out cycle routes and were opposed to Councils being allowed to use indicative cycle lanes which they considered dangerous.

Delivery Plan - Effective Resourcing

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Review options for multi-year, long-term funding for infrastructure and behaviour change programmes where appropriate	Transport Scotland	RoadSafety Scotland	Medium
Increase active travel budget to £320 million or 10% of the transport budget, whichever is greater, by 2024-25	Transport Scotland		Medium
Ensure the appropriate level of resource is in place to develop and deliver active travel strategies ensuring that cycling for transport is prioritised appropriately	Local Authorities	Sustrans, Regional Transport Partnerships (RTPs), Transport Scotland	Medium
Work with manufacturers, social enterprises and industry vocational partners to increase cycle and cycle parts production and recycling in Scotland with a focus on green skills and materials research and development	Transport Scotland	Energy Savings Trust (EST), Cycling UK, Scottish Credit and Qualifications Framework Partnership, Cycling Scotland, Scottish Enterprise	Medium

7 Do you have any comments on the substance of the delivery plan actions in this section?

The RCPE generally welcomes the proposed actions in the delivery plan here.

8 Do you have any comments on the agencies identified to lead and support these actions?

We consider that the plan appears to identify the correct agencies here.

9 Do you have any other comments on this section of the delivery plan?

The RCPE has no specific additional comments on this section of the plan.

Delivery Plan - Fair Access

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Expand access to cycles, including adaptive cycles, e-cycles and cycle share	Local Authorities, Transport Scotland	Active Travel Delivery Partners	Short
Review funding criteria to ensure that fair access is appropriately weighted and improving accessibility is given an appropriate level of priority	Transport Scotland and Sustrans	Local Authorities	Medium
Improve quality and level of service of carriage of bikes on trains and require rural and island bus services to carry cycles, where appropriate	Transport Scotland	RTPs, Local Authorities, ScotRail, Bus Operators	Medium
Support cycling journeys to and from public transport hubs as part of a multi-modal journey	Sustrans, Local Authorities	ScotRail, Network Rail	Medium
Provide a free bike to all children of school age who cannot afford one	Transport Scotland		Short

10 Do you have any comments on the substance of the delivery plan actions in this section?

The RCPE considers that fair access is of fundamental importance and supports all appropriate actions designed to help achieve this.

Fellows welcome specific efforts to include people with a low income and help them access cycles and education. They consider that there should be focused work done to include marginalized people, particularly those currently under represented in cycling as a form of active travel including people who are overweight, older people, refugees, people from black and minority ethnic backgrounds, and women, including those who dress modestly.

One Fellow suggested that urban buses should also be made to carry bikes as it was often too difficult to determine between urban or rural services as they run to both. They highlighted the bike holders often at the front of buses abroad which can take three cycles.

11 Do you have any comments on the agencies identified to lead and support these actions?

The RCPE considers these agencies are appropriate.

12 Do you have any other comments on this section of the delivery plan?

The RCPE has no additional comments on this section.

Delivery Plan - Training and Education

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Provide a comprehensive cycle training offer for all life stages, including learning to ride in pre-school, learning to ride on-road through school bikeability training, and for adults of all ages, including cycle awareness training	Transport Scotland, Cycling Scotland	Education Scotland, Local Authorities, Sustrans	Short
Use the Cycling World Championships (CWC23) to inspire people, especially young people to cycle	CWC23		Short
Promote the new Highway Code and implement requirements for cycle training	Transport Scotland	Local Authorities, Cycling Scotland, Road Safety Scotland	Short
Provide local authorities with resources, including guidance and best practice examples, to enable effective local community engagement	Transport Scotland	Sustrans, Cycling Scotland, Local Authorities	Short
Develop a long-term communication plan that represents cycling as something that anyone can do, including with assistance/adaption and is a transport mode that brings many benefits to Scotland	Transport Scotland	Scottish Government, Active Travel Delivery Partners	Medium

13 Do you have any comments on the substance of the delivery plan actions in this section?

The RCPE considers this section appears to be appropriate.

14 Do you have any comments on the agencies identified to lead and support these actions?

We consider they appear to be the correct agencies.

15 Do you have any other comments on this section of the delivery plan?

Fellows consider that the role of teachers is an important one and should be referenced. If someone cycles as a child they are more likely to cycle as an adult. Cycling proficiency tests at Primary School level are to be encouraged.

Delivery Plan - Network Planning

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Produce active travel strategies for each local authority area, setting out plans to improve active travel networks and facilities to 2030	Local Authorities	SCOTS, RTPs, Sustrans, ScotRail	Medium
Strategies should be in line with regional transport strategies, include detailed mapping and use an evidence-led approach to network planning			
Produce digital active travel mapping ('a network blueprint') for Scotland, which is informed by local authority transport strategies	Transport Scotland	RTPs, Local Authorities, Active Travel Delivery Partners (ATDPs), ScotRail	Medium
Work with other policy areas to introduce localised active travel networks as part of a larger package - e.g. local development plans - to create efficiencies	Local Authorities	ScotRail, Network Rail	Medium
Support the travel demand management measures aligned with the national 20% car km reduction route map	Transport Scotland	Local Authorities	Short
Review how active travel/cycling schemes are appraised - broaden the benefits to include social, economic and equality benefits	Transport Scotland		Medium

16 Do you have any comments on the substance of the delivery plan actions in this section?

Fellows again suggested it would be appropriate to reference positive community involvement and engagement in relation to the delivery plan.

17 Do you have any comments on the agencies identified to lead and support these actions?

The RCPE considers these are appropriate.

18 Do you have any other comments on this section of the delivery plan?

The RCPE has no additional comments.

Delivery Plan - Monitoring

Action	Lead Delivery Partner	Supporting Delivery Partner(s)	Short, Medium or Long Term
Expand and where possible align monitoring and reporting of cycling levels at local, city, regional and national level and share learning	Transport Scotland	Local Authorities, RTPs, Cycling Scotland, Sustrans,	Short
Continuously monitor and evaluate the impact of active travel investment and embed learning in future investment decisions	Local Authorities	ATDPs, RTPs	Short
Conduct research on the social, environmental and economic factors influencing network planning, for example pandemic recovery and climate change impacts	Sustrans		Medium

19 Do you have any comments on the substance of the delivery plan actions in this section?

Some Fellows consider that schools are an important area in terms of monitoring up take of cycling; they also suggested local cycle group membership was an important source of information.

20 Do you have any comments on the agencies identified to lead and support the actions in this section?

The RCPE has no additional comments.

21 Do you have any other comments on this section of the delivery plan?

The RCPE has no additional comments on this section.

Active Travel Transformation Project

In the 'Bute House Agreement' between the Scottish National Party and the Scottish Green Party in 2021, it was agreed that at least £320m or 10% of the total transport budget will be allocated to Active Travel (AT) by 2024/25. There is consensus that existing AT delivery models will not be scalable, nor in many cases suitable to meet the ambition of this new budget.

An Active Travel Transformation Project (ATTP) has been set up to assess the current delivery model and inform and implement a new delivery model for the future of AT. The primary objective of the ATTP is to maximise the opportunities in AT delivery in the short-term (2022/23) and medium term (2023/24-2024/25), to deliver the most effective and efficient achievement of AT outcomes.

Working closely with AT delivery partners, the ATTP is being delivered in two phases. Phase one focuses on evaluation and evidence gathering. This phase aims to assess the existing active travel delivery model by identifying constraints and opportunities. Phase two will use this evidence to develop and prioritise proposals for changing the delivery model.

The ATTP will culminate in December 2022 with a report to the Minister for Active Travel which will provide evidenced proposals for holistic changes to AT delivery in Scotland.

As part of the ATTP we are considering different models of incentivisation, evaluation and monitoring for local authorities.

To what extent do you agree with the following statements:

22 For large infrastructure projects, conditions of funding should be delivery on agreed targets for: timescales, expenditure and meeting project objectives.

Please select only one item

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

Comment

The RCPE has no specific comments.

23 In order to ensure maximum value for money and impact, active travel funding in the short term should be prioritised for those local authorities with the greatest capacity to deliver, with capacity building support offered to those with the least.

Please select only one item

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

Comment

Some Fellows were concerned at the suggestion that funding should be focused only on those councils able to deliver projects more easily and indicated that funds should be distributed in the fairest way so that all parts of Scotland can access safer cycling and better air quality.

24 Future funding for active travel infrastructure should include a mechanism for re-distributing investment from local authorities unable to deliver to agreed standards and timescales.

Please select only one item

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

Comment

Fellows consider this may be appropriate but also consider that positive community involvement and local communities pushing councils to deliver the work is essential to prevent failure to put infrastructure in place.

Impact Assessments

As part of the development of this policy framework, and to comply with our statutory obligations, a number of impact assessments have been carried out. These impact assessments are currently in the draft - or pre-screening - stage and are available to read alongside the framework and delivery plan.

The impact assessments that have been carried out are: Social and Equalities Impact Assessment (SEQIA), Business Regulatory Impact Assessment (BRIA), and Island Communities Impact Assessment (ICIA).

In order to inform the next phase of the development of the framework and delivery plan we welcome your comments on the draft impact assessments.

22 Do you have any comments on the draft Social and Equalities Impact Assessment?

Fellows agree that the plan has the potential to tackle inequalities. One Fellow emphasized that most people living along polluting roads in lower SIMD may not even own a car.

23 Do you have any comments on the draft Business Regulatory Impact Assessment?

The RCPE has no additional comments.

24 Do you have any comments on the draft Island Communities Impact Assessment?

The RCPE has no additional comments.

