

PE1653/C

Sustrans Scotland submission of 14 August 2017

Introduction

Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

Sustrans Scotland are pleased to be given the opportunity to provide comment to the Public Petitions Committee. Our response refers directly to the title of the petition, and also attempts to contribute to the discussion and answer questions arising from the meeting of 29 June 2017 at which the petition was originally considered.

1. Cycling infrastructure and Scottish law

- 1.1 In 2015, the Westminster Government enacted the Infrastructure Act. This established a law requiring a strategy for cycling and walking infrastructure and necessary funding for implementation¹.
- 1.2 However, the Act does not apply in Scotland² (beyond powers associated with community energy). Whilst funding for walking and cycling in Scotland is at record levels during this parliament³, this means that there are not the same legal requirements to support active travel in Scotland.
- 1.3 There is not, to address the petition directly, a requirement to include active travel provision in all new major infrastructure projects. Nor is there a legal requirement to provide funding for cycling infrastructure.
- 1.4 Therefore, whilst there is funding available, the spending and prioritisation of cycling provision is not governed by law and open to varying standards of implementation. The result of this is that the standard of both walking and cycling infrastructure varies significantly in different areas.
- 1.5 This means that 'provision' for cycling can be interpreted and defined differently by different parties involved in the design. Without legislation, there is no requirement to prioritise or promote walking and cycling.

2. Measuring quality

- 2.1 In response to the original petition, Rona Mackay MSP noted the importance of how we measure the provision and quality of active travel infrastructure. Currently it is difficult to objectively measure the quality of infrastructure.
- 2.2 The petitioner cited the example of assessing whether provision is suitable for a child, which can be a useful exercise. Whilst this is not an objective measure, it represents a better standard than is currently being universally adhered to.

¹ http://www.legislation.gov.uk/ukpga/2015/7/pdfs/ukpga_20150007_en.pdf

² <https://www.lawscof.org.uk/media/301581/briefing-paper-infrastructure-bill-hl-westminster.pdf>

³ <http://www.transport.gov.scot/news/investment-promises-delivered-inaugural-active-travel-summit>

3. Commuter routes from regional centres into city centres

- 3.1 Sustrans Scotland believe that cycling is something that everyone should be able to do in all places in Scotland. However, realising the vision of 10% of journeys being made by bike by 2020 will require significant growth in cycling in Scotland's cities.
- 3.2 Short journeys must be targeted for modal shift to walking and cycling. The commute to work should be a prime target, and Transport Scotland data from 2011 indicates that 55.5% of journeys to work are of 10km or less⁴, a feasible distance to cycle. Achieving the 10% modal share for cycling will require better provision for cycling to work.
- 3.3 Whilst Scotland has strong active travel policies, none of these legally mandate construction of cycling infrastructure. The result of this is sub-standard provision for cycling, such as the proposals for Sheriffhall roundabout in Edinburgh or the Pollok roundabout in Glasgow. Both of these junctions are part of connections between regional and city centres and, as they are currently designed, present an active discouragement to the uptake of cycling.
- 3.4 Sheriffhall roundabout in particular is emblematic of short term decision making. Given the extensive housing development proposed in the area there will be increased appetite for both walking and cycling connectivity to Edinburgh and the surrounding area. Failure to give due attention to active travel now is likely to lead to disruptive and expensive retrofitting being required at a later date.

4. Data and infrastructure decisions

- 4.1 In the meeting of 29 June 2017, the petitioner rightly identified that if a goal of transport provision is to achieve the vision of 10% of journeys being completed by bike, then a fundamental change is required in how we evaluate infrastructure.
- 4.2 The 10% vision should be considered in tandem with the Scottish Government's long term commitments to improving health, air quality and reducing emissions, which should inform decision making of any infrastructure project. As a minimum, any project should contribute to meeting this.
- 4.3 Transport appraisal is vital in helping to inform decisions on infrastructure project delivery. However, we contend that it should not be the only determining factor and that the current methodology has deficiencies that bias decision-making against walking, cycling and local impacts (for communities, economies and air quality).
- 4.4 Where Scottish Transport Appraisal Guidance (STAG) is used to inform decisions it has a tendency to undervalue active travel. Present appraisal does not adequately capture the value of co-benefits, including but not limited to:
 - Leisure cycling and walking
 - Health benefits
 - Retail benefits of cycling and walking
 - Job creation and safeguarding
 - Increased productivity

⁴ Table 11.31 Employed adults (16-74) distance to place of work:
<https://www.transport.gov.scot/media/35803/scot-tran-stats-35-chapter11-personal.xls>

- 4.5 Furthermore, the transport appraisal process should be more transparent and allow for full engagement with stakeholders and communities from the outset. At present, consultation does not permit a desirable level of engagement with communities.
- 4.6 In the case of Sheriffhall roundabout, a comparatively minor decrease in journey time for people in cars has helped to justify discouraging people in a large geographical area from cycling into Edinburgh. This decrease in journey time, measured as 'value of time', is hypothetical. There are no more 'coins into the cash register' from this value⁵.
- 4.7 Sustrans Scotland are not aware of any systematic applications of data on cycle users being used to determine infrastructure planning. It is necessary to reconsider how we want to shape our future towns and cities and understand the impact of increasing road capacity in such projects.
- 4.8 Sustrans Scotland leads social research into public opinion on cycling. The Bike Life study surveys residents of cities to gauge the appetite for cycling and required infrastructure in a city. In Scotland this has so far only been undertaken in Edinburgh in 2015, but is currently being repeated, and there are plans to expand this to the other six Scottish cities.
- 4.9 Across the UK, and in Edinburgh⁶, Bike Life regularly reports that public appetite for walking and cycling provision is underestimated by decision makers. Sustrans Scotland contend that transport appraisals do not answer the questions that decision makers should be asking, nor do they reflect what is actually important to people.

5. Infrastructure strategy for active travel

- 5.1 The Minister for Transport and the Islands, Humza Yousaf, has established the Active Travel Task Force⁷ to identify and overcome the barriers to active travel in Scotland. Sustrans Scotland is an active participant in the Task Force and anticipates outputs which will make a limited contribution to the goals of the petition.
- 5.2 However, the committee may note the open question of a legislative pathway to ensuring cycling provision is adequately considered in infrastructure decisions, and a requirement for more funding to achieve the vision of 10% of journeys being completed by bike by 2020. At present, insufficient funding is available to implement strong Scottish policies for active travel.
- 5.3 Sustrans Scotland believe that an infrastructure strategy should reflect current policy; the Scottish Government's sustainable travel hierarchy, outlined in the National Transport Strategy (2016), promotes walking and cycling prior to other forms of movement⁸. This is not reflected in major infrastructure, or decisions such as the Sheriffhall or Pollok roundabouts. As an appendix to this document Sustrans Scotland's letter to AECOM regarding Sheriffhall roundabout is included.
- 5.4 The Strategic Project Transport Review should include active travel as a theme. This would boost the National Walking and Cycling Network, a key element in National

⁵ <http://www.sustrans.org.uk/blog/how-do-we-value-travel-time>

⁶ http://www.sustrans.org.uk/sites/default/files/bike_life_edinburgh_2015.pdf

⁷ <https://www.transport.gov.scot/our-approach/active-travel/active-travel-task-force/>

⁸ <https://www.transport.gov.scot/media/10310/transport-scotland-national-transport-strategy-january-2016-final-online.pdf>

Planning Framework No3⁹, and incorporate the Scottish Governments Strategic Objectives of a 'Wealthier and Fairer, Healthier, Safer and Stronger, Smarter and Greener Scotland'¹⁰. This current omission serves to diminish the importance of active travel in major projects.

6. Conclusion

Sustrans Scotland concur with the petitioner that Scotland needs to develop an active travel infrastructure strategy that will require active travel provision to be incorporated into all new major infrastructure projects.

Failure to adopt the Infrastructure Act (2015) in Scotland means that it is both possible and common for walking and cycling to be seemingly ignored in decision making, despite this working against Scotland's strong active travel policies. Cycling in Scotland would benefit from legislation that encouraged the delivery of strong and supportive active travel policies.

We would welcome the opportunity to attend and discuss the issues raised with the Committee.

⁹ <http://www.gov.scot/Topics/Built-Environment/planning/NPF3-SPP-Review/NPF3>

¹⁰ <http://www.gov.scot/About/Performance/scotPerforms/objectives>

Appendix

Thank you for your letter dated 10th April, 2017 with reference to the A720 Sheriffhall Junction Improvement - Environmental Impact Assessment Scoping.

Sustrans responded in January 2017 to the consultation carried out by Aecom in November 2016. We assessed the three options presented (A, B and C) against the five Core Design Principles in Cycling by Design; safety, coherence, directness, comfort and attractiveness.

Considering these design principles, we felt strongly that option C was the best for active travel (walking, cycling and non-motorised users). We also provided, for reference, two examples of provision for active travel at grade separated junctions near to Sheriffhall - one an example of good provision and the other, an example of very poor provision.

Finally, we provided thoughts on ensuring how option C could be made even better for walking, cycling and non-motorised users.

Having provided such a detailed response, we were extremely disappointed to receive your letter which stated that the preferred option had been chosen. This option is very poor for active travel. In fact the layout looks similar to the A720 Straiton Junction, an example of 'poor active travel provision' provided in our previous response. Your letter made no reference to what the thought process or design principles were that enabled you to come to this conclusion.

We feel that the redesign of Sheriffhall should enable people to make local journeys across the junction on foot and by bike, reducing the severance caused by the A720. There are many potential active travel journeys which require a safe crossing of Sheriffhall roundabout. (For example major employment sites at Edinburgh Bioquarter and Royal Infirmary)

Far from creating an exemplar design that enables the movement of both vehicular traffic and people travelling actively, the preferred option will discourage walking and cycling between Dalkeith and Edinburgh, not to mention for new residents of the developments planned for Shawfair and Gilmerton. There is an opportunity being ignored to make walking and cycling a central part of these new communities, as new residents reconsider how they make regular journeys when they relocate.

For this reason, Sustrans will not comment on the design chosen for the A720 Sheriffhall Junction as detailed in your letter of 10th April 2017. We would like to draw your attention once more to the response we provided in January 2017 and urge you to re-think your preferred design option.