

RTS DRAFT CONSULTATION

Highland Cycle Campaign response

Below are some comments on the Regional Transport Strategy (draft). Where possible, we have suggested changes in wording which would enable our concerns on emphasis and content to be met. Our first comments on the vision and objectives highlight our concern about the priorities of the strategy. We believe that given the rapidly developing national, European and global concern on climate change, peak oil and environmental footprint that these objectives follow a far too conventional "predict and provide" method. We believe that Hitrans (as a statutory authority) should lead by example in encouraging a lowering of our Western per capita levels of consumption particularly in respect of non-renewable resources and carbon emissions.

This does not mean that in any one infrastructure project that is deemed important that there will not be a minimal quantity of embodied energy consumption and carbon emission. It does mean that these projects should be very carefully designed. Every opportunity should be taken to enhance local development for local communities and active travel. Every encouragement should be given to local people to live, work, socialise and enjoy their leisure in a way that does not compromise the health and survival of all on our planet.

While the over-arching goal of economic growth is consistent with Scottish and UK government policy there is growing realisation in central government that there is an unresolvable conflict between such conventional growth and the need to combat climate change and non renewable resource depletion.

We believe that Hitrans should put economic affairs on a par with the other goals. Thus the phrase "economic growth" should be altered to "economic activity". It should not be a "top" priority but a tool to achieve the other strategic aims of the Scottish Parliament, which include health, social inclusion, and sustainable development. Targeted growth may contribute to these but general economic growth aiming to maintain western levels of consumption is inimical to sustainability and very likely to lead to social catastrophe (Stern Report, Oct 2006).

It would be good to see Hitrans following the example of the Scottish Executive in setting up a sustainable transport team for the region. The creation of such a team would demonstrate a commitment to active travel, and help to place more emphasis on walking and cycling as part of a sustainable transport policy.

We hope the comments and suggested changes below will be useful and assist you with forming and pursuing a strategy which contributes to making the Highlands and Islands an attractive destination for people, enabling them to live, function, mix and co-operate in a sustainable, healthy, happy and fair way with their neighbours and fellow humans near and far.

1. INTRODUCTION

Vision and Objectives

Regarding environmental impact, we note that the original voluntary partnership (Hitrans vp)

contained the following statement in its vision:

1.5 ..."is sustainable and has minimal practical impact on the environment "

In the issues report which informed the stakeholders consultation (October 2006) various scenarios emphasising different outcomes were tested against the strategy outcomes. From this it was decided that the above statement was too strong on environment and in the RTS "Strategy vision and objectives" this objective has been altered to:

"Manage the impacts of travel on the region's environmental assets."

If the original statement "...minimal practical..." was weak the revised one "...manage the impacts..." is weaker. The revised objective could be used to justify almost any strategy and consequent development process. At the least the original objective should be retained. We would prefer to be more specific and change the objective to:

"Minimise emissions and consumption of resources and energy".

1.8. We also felt that the previous strategy was weak in emphasising the contribution to health that should be made.

2. BASELINE AND SCOPING OF ISSUES

2.4 - 2.7

Your quote is 24 years old and therefore predates much progressive thinking. Transport can also be seen as a factor in drawing people away from their localities for services elsewhere. Research carried out for Highland Council more recently shows that investment in local facilities to help keep people working locally and consuming local services and products is a desirable way of achieving community strength and sustainable development (Farrington (Aberdeen University) and Gray (CTP Robert Gordon)).

They also showed that dependence on car travel is frequently "constructive", that is, a perception rather than a fact. This is hardly surprising given the political and media emphasis on this subject.

2.7 Car ownership

At 66 to 79%, car ownership may be high in rural areas, but it is not universal. A significant minority of households (21 - 34%) lives without a car. Every effort should be made to support them by investing in active travel and public transport. Continual mention of "the necessity of car ownership in rural areas" further marginalises car-less households.

The financial costs of car ownership *are* particularly burdensome for low-income families. However, car owners do not pay the full public cost of their transport. Low-income families without cars may therefore be subsidising better-off car owning households.

In a previous document, Hitrans stated that: "The car culture has superseded a tendency to walk... even when distances are short" (Report to Stakeholders, Oct 2006). This comment is

well worth repeating here since this has huge implications for health as well as for the environment.

2.8, 2.9 & Table 2.1

The travel to work figures shows active travel hovering around 25% (23% to 29%) for all areas except the Western Isles (14%). Moray and Highland have cycle to work levels 3 to 4 times that of the national average. It is a pity that the consultant did not pick this out. It is indicative of a receptive culture and, in the Inner Moray Firth, of popular support for high quality cycle infrastructure projects.

Please alter 2.9 to read:

"for many of those walking and cycling to work.....across the region.....An encouraging feature is that cycling levels are at or above national levels particularly in Highland and Moray. It is important that we use this positive culture to encourage greater use of cycling for travel to work."

2.10

There is no mention here either of existing cycle routes, or of the problems that walkers and cyclists face in accessing the road network.

Please add:

"There is no coherent cycling/walking network. Walkers and cyclists often have to travel along or across high speed roads as part of rural journeys of all distances."

2.12

The numbers of cyclists are greatly boosted by visitors in the tourist season and shoulder months. The low environmental impact economic opportunity here should be noted. The Highland area is the destination for 40% of all cycle tourists to Scotland. Further information can be obtained from Highland Cycle Forum's "Value of Cycling to the Highlands & Islands" study (2004). In percentage increase terms cycling will greatly exceed the 200% traffic figure shown. In September 2005 two HCC representatives and two THC officials travelling by car from Inverness to Fort Augustus in midweek mid morning counted 24 cyclists along the A82 during a period of approximately one hour.

Please add:

" It is estimated that cycle traffic increases by many times its normal levels during this period. "

2.13 - 2.14

Please mention integration with active travel here. We note that improving facilities for active travel - especially walking and cycling links between communities - will make public transport more accessible for a greater number of people.

2.16 - 2.17

No mention of active travel is made in these sections. Why not? Baseline information is required for walking and cycling too. If you do not address it, it begins to be omitted from consciousness. In fact we can be quite positive. The levels of cycling in Moray and Highland can be given, and more local levels e.g. in Nairn, Elgin and parts of Inverness can be quoted

as "between 6 & 8% .."

2.31

The figures quoted here suggest that most people's travel to work journeys are not significantly longer than elsewhere. A more useful figure would be a breakdown of journey length within the region. This would give an indication of the number of journeys that are potentially suited to active travel.

2.38

HGV volumes and speeds do have significant impacts on the safety and perception of safety of walkers and cyclists. While the speed limit on such vehicles is 40mph on single carriageway roads (i.e. most trunk and regional roads) drivers commonly travel at 60mph with impunity. Given that the trunk or regional road is so often the sole route for cyclists (and walkers) and that statistically HGVs are the most dangerous and lethal vehicles to other road users (especially cyclists) this issue is most serious. We will not get an active travel culture until it is perceived to be safe for people to cycle and walk. Minimising active travel *is* a significant negative environmental impact.

2.39 - 2.44

The importance and potential contribution of cycling to the area's economy has been mentioned above (see 2.12). We have referred to the HCF study and warmly recommend its inclusion and use as a relevant document in the RTP's resource base.

Therefore, please add:

2.40

- "Lack of good provision for walking and cycling."

2.43

"It is important, too, that in enabling tourists to travel more efficiently by car and public transport, we ensure that those walking or cycling are not disadvantaged. Cycle touring is uniquely placed to make a significant contribution to the area's economy while having a minimum impact on the environment and a very low carbon footprint. Cyclists use smaller local facilities, and investment in and promotion of this form of tourism has been found to revive threatened rural community facilities. A notable example is the CtoC route in northern England."

2.44

"However, levels and speeds of traffic are a disincentive to active travel even in less congested areas."

2.46 & Table 2.4

Table 2.4 seems to be all threats and no opportunities.

- Car ownership

Part of the problem is that car purchase and running costs have fallen over the last 20 years whereas public transport costs have risen. This has undoubtedly been a major factor creating a constructively car dependent population. We believe your consultant is correct in now expecting car costs to increase. The opportunity is therefore to provide for and encourage active travel and public transport throughout the region. This will contribute to your goals of public health, social inclusion and the environment.

- The regions roads

Add:

"Limited provision for walkers and cyclists" as a problem here.

- Subsidised bus network
- Rail network

In both add:

"Limited integration with cycling" as a problem.

- Affordability of transport

Add:

"Lack of infrastructure for walking and cycling" as a problem.

- Tourism

We have already pointed out the opportunities (see 2.12 and 2.39).

Add:

"Limited provision for walkers and cyclists" as a problem here.

2.47

We commend you on your use of the term **economic development** rather than economic growth. It would be good to see Hitrans using this term throughout thus breaking the national mould.

Under 'Environmental impacts', please introduce some recognition of wider environmental issues such as climate change.

Add:

"There will be an increase in carbon emissions from embodied energy in additional infrastructure and from extra fuel consumption."

3. SETTING OBJECTIVES

3.3

It seems that via the stakeholders consultation process some changes have been made in formulating the Strategy Vision and Objectives (**Fig 3.1**) and we welcome this with regard to health. We have already highlighted our concerns with respect to the environmental issues. We re-iterate them here.

Fig 3.1 and throughout.

Change:

"Manage the impacts of travel on the region's environmental assets" to "**Minimise emissions and consumption of resources and energy**" and place 'Economy' on a par with the other objectives.

3.13 and throughout

Please alter last sentence:

".....(.....integration and environment)." to "**.....(....integration and environment/health).**"

3.14

We note that cycling and walking are most relevant to the planning objectives.

Table 3.1

Insert a tick at the co-ordinates of Environment and Accessibility since a policy to provide high quality access for cycling and walking clearly contributes to achieving that objective.

4. GENERATING OPTIONS

Please also see our comments in **Appendix A**.

4.18

The A82 also fails with regard to providing for active travel and cycle tourism, as do most major roads in the region. Why was this not included within the measure of adequacy?

Please add:

"...passenger transport provision **and cycling/walking provision.**"

4.29 & Table 4.1

Modal shift and its contribution to health and environment is here included under "other".

Please give clear emphasis to the importance you are attaching to cycling and walking.

Alter:

"Other" to "**Modal shift/Integration**" here and throughout.

We would then argue that ticks should be inserted in this column for both participation and health.

Tables 4.2 & 4.3

For reasons given above all roads projects shown in the tables should receive a tick in the box marked "other " and this box should be re named as requested in comments on **table 4.1** above.

4.32

- Network development options

Add:

"Such interventions will be for the benefit all users."

- Service options

Add:

"This will include integration with active travel."

4.37

- Active travel

We welcome these aspirations.

- Locally significant network and road maintenance

Please alter last point:

".... and community transport." to **"...community transport and active travel."**

- Mainstream passenger transport

Please add the bullet point:

- **"Improve integration with active travel by providing secure parking at interchanges and carriage of cycles on buses, trains and ferries."**

5. SIFTING AND PRIORITISING THE STRATEGIC OPTIONS

5.6

We particularly welcome the inclusion of policy tests that reduce transport emissions and increase active travel.

- Connectivity for accessibility

Please amend the penultimate point to:

"Option extends the reach of passenger transport or active travel."

Please amend the final point to:

"Option makes passenger transport or active travel more attractive than the car."

5.9

We are pleased to see you mention the SPP17 private transport hierarchy. It is rather buried here in brackets. Why not makes more of it? Please highlight it as a list in bold type.

Table 5.1 & 5.2

You have not ticked the health box for any of the road priority links except for some on A9 north, and cycling is only mentioned for this and the A96. This gives the clear message that you have not considered improving other projects with regard for cyclists and walkers. Since many of the roads are trunk roads, it is to be hoped that Transport Scotland will continue their policy (noted in our comments on **Appendix A**). However it would be invidious and

regressive if the RTS did not pick up and build on this for *all* roads whether strategic, regional or local. We strongly urge you to amend **tables 5.1 & 5.2** in line with our requested amendments in **4.29** and **tables 4.1 & 4.2**.

All roads priority links in **tables 5.1 & 5.2** should then receive ticks in the health box indicating your commitment to real shift to cycling and walking.

Table 5.3

Active travel

We note how this fits *all* strategy objectives and opposes none!

H27a We are pleased that you have highlighted the need to use land use planning and development control to promote active travel. This is vital for sustainable travel in general. We think that better connectivity between those involved in planning and transport is also important.

Congestion & Urban Issues

Please add a health box tick for **H30a** (Infrastructure) & **H30c** (Package)

Mainstream Passenger Transport

Please add:

"H33k - Invest in integration with active travel (e.g. cycle security and carriage)."

APPENDIX A

The omission of cycling and walking from this appendix of Strategic and Regional Network Priority Links gives concern. A large number of major roads in the region (including the majority of those mentioned) are sole routes. That is to say that they are the only routes for *all users*. As such they must be made fit for purpose for cyclists and walkers, or a suitable high quality alternative must be provided. In the case of trunk roads the Scottish Executive appear to have accepted this in principle and are beginning to provide segregated shared use facilities on trunk road improvements. They have also provided or planned for such facilities as remedial work on some trunk roads e.g.

A96 Nairn - Auldearn

A9 Kessock Bridge - Kessock junction

A9 Kingussie - Newtonmore

A82 Fort William - Torlundie

A835 Tore - Maryburgh

A 832 Loch nan Uamh to Arisaig

It has taken some time to achieve this shift in thinking (the devolution of powers to the Scottish Parliament has been progressive in this respect). It is important that the RTP builds on this position and does not regress. Very often only a relatively small section of remedial work is needed to link alternative routes. Where a new road is replacing an old road (either

fully or in part), the old road should be retained where substantial sections exist, or segregated paths constructed (minimal extra cost at the construction stage). Any environmental impact of such extra road space tends to be on landscape. It is more than compensated for by the encouragement of sustainable travel. The overall environmental impact therefore should be scored as positive.

Unfortunately our only example of such a project in which the Hitrans Voluntary Partnership was involved produced a design which is completely regressive. It totally ignored the needs of cyclists and the potential economic benefits of investing in cycle touring and recreation in an area much visited by cyclists. This was the A832 Achnasheen to Kinlochewe road improvement.

The opportunity to provide a cycle and walking route appears not even to have been considered, despite there being ample room and easy topography for most of the route. Achnasheen is a transport interchange - it is the nearest train station for many residents on the A832 loop. It is only 11 miles from Achnasheen to the village of Kinlochewe where there is a campsite and bunkhouse accommodation. The major tourist attraction of Inverewe Garden is less than 40 miles away - an easy distance for many touring cyclists.

The resulting design increased the hostility of the road by concentrating on the "big" Hitrans issue of journey speed. A very fast (60mph +) narrow (HGV threat) carriageway has been built. At the Achnasheen end of the route, quite unbelievably, a mile or so of the 60mph road has new stone dykes built up to within 150mm of the road edge white line. This appears to have been done on the basis of "improving the environment ". It has created a highly dangerous section for cyclists and walkers.

In the Glen Docherty section we have managed to get some belated concessions in design but these are restricted of necessity, we are told, on environmental grounds. This section of road crosses some hills that are considered to form an attractive skyline. Thereafter, the road descends through the attractive countryside of Glen Docherty to Kinlochewe. The width of the road had to be restricted owing to the visual impact it would make on this scenery and there were also constraints in design demanded by SEPA.

Extra width for cycling and walking is therefore considered an environmental disbenefit on visual grounds. But no counter consideration is given to the opportunities for sustainable choice and culture change that it provides with concomitant environmental benefits. We believe the latter outweigh the former. It is very much to be hoped that this dreadful piece of design can be remedied. Until then it can serve as an object lesson in how not to design a regional link.

It is vital that *all* road designs are progressive in respect of cycling and walking.

We believe that Hitrans must give a very clear indication that for all these projects cycling and walking will be made a viable option for all competent individuals. The strategic and regional roads are often the only links between neighbouring communities e.g. Golspie - Brora - Helmsdale. Cycling and walking improvements must not be relegated to the "local",

therefore, since our strategic and regional networks contain many roads that are the only option for cyclists and walkers.

Therefore, we request the following:

For all roads, comment on the current provision for active travel. Include any difficulties that walkers and cyclists may have in accessing the road, and the availability of any suitable alternative routes.

For the rail network, please comment on the current provision for integration with active travel (e.g. bikes on trains, cycle parking at stations). Include any difficulties that active travellers may have in accessing the rail network.

Appendix B

Description of Horizontal Themes

B1.1

This statement is well put clearly indicating how active travel contributes to four policy areas.

B 1.2

We are glad that you point out high returns on investment. You might add that the investment levels to achieve high quality facilities are small compared to that required for other transport modes.

You could also reiterate that in certain areas a receptive cultural environment already exists. (See comments above on **Table 2.1**). We urge you once again to make full use of "The Value of Cycling to the Highlands & Islands" (HCF 2004).

B1.4

Please add that active travel helps to reduce social exclusion.

B 1.17

The locally significant network can often contain as its major element the regional and strategic road. That is why it is important to include cycling and walking at these levels.

B 1.18

Point well made.

B1.20

Integration with cycling and walking has been omitted. The provision for cycles on trains is poor throughout most of the region. Families constantly report problems in attempting to travel to, through and in the Highlands. Certain railway stations have no safe access for cyclists and walkers (e.g. at Forres, where there is no safe crossing across the A96).

Please add:

"Good, safe walking and cycling access must be provided to all bus stops and stations. There should also be secure cycle parking. There must be adequate provision for bike carriage on trains and buses. "

B 1.25

We do not object to charges for cycles on ferries. However, these can become prohibitive for families and when island hopping. Every effort should be made to encourage the carriage of cycles on ferries.

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