

Cycling Framework and Delivery Plan for Active Travel

Consultation Summary Report

Transport Scotland

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Quality information

Prepared by	Checked by	Verified by	Approved by
Andrew Reid	Andy Keba	Richard Adams	Yannis Kontolaimakis

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Prepared for:

Transport Scotland
 Victoria Quay
 Edinburgh
 EH6 6QQ

Prepared by:

Andrew Reid
 Consultant
 E: andrew.reid1@aecom.com

AECOM Limited
 1 Tanfield,
 Edinburgh,
 EH3 5DA
 United Kingdom

T: +44 (0)131 301 8600
 aecom.com

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1. Introduction

1.1 Purpose

AECOM has been commissioned by Transport Scotland (TS) to undertake a series of impact assessments on the Cycling Framework and Delivery Plan for Active Travel (the Cycling Framework). This includes the following:

- A Combined Social and Equality Assessment (SEQIA), to include:
 - Equality Impact Assessment (EqIA);
 - Health Inequalities Impact Assessment (HIIA);
 - Child Rights and Wellbeing Impact Assessment (CRWIA); and
 - Fairer Scotland Duty Assessment (FSDA).
- Separate Impact Assessments for:
 - Island Communities Impact Assessment (ICIA); and
 - Business and Regulatory Impact Assessment (BRIA).

This report sets out the summary and analysis of the feedback from consultation undertaken as part of the assessment against the above Impact Assessments. A separate Strategic Environmental Assessment (SEA) screening report was also submitted to the Scottish Government SEA Gateway. The screening assessment determined that a full SEA is not required of the Cycling Framework.

1.2 Cycling Framework and Delivery Plan for Active Travel

The Cycling Framework sets out 38 Actions, under five strategic themes, which are aimed at achieving the cycling elements within the five objectives of [Transport Scotland's Active Travel Framework](#):

- Cut carbon emissions and other pollution
- Delivering liveable, more pleasant communities
- Better health and safer travel for all
- Reducing inequalities - jobs, services, leisure
- Supporting delivery of sustainable economic growth

By helping to achieve the objectives of the Active Travel Framework, the actions within the Cycling Framework will contribute to achieving the Vision and the Priorities of Scotland's second [National Transport Strategy \(NTS2\)](#).

Alongside the [Climate Change Plan](#) and Scotland's [fourth National Planning Framework \(NPF4\)](#), NTS2 provides the strategic policy basis for the active travel interventions detailed in the Cycling Framework.

The Climate Change Plan update (CCPu) provides emissions reduction pathways for the transport sector equating to a halving of emissions by 2028, 70% reduction by 2040 and net-zero by 2045. The CCPu outlines eight policy outcomes designed to achieve the required level of emissions reduction. Active travel interventions contribute directly to CCPu Outcome 1 (Reduce car kilometres by 20% by 2030). Impact assessments have been produced and are available [here](#).

NPF4 sets out how the planning system will help to deliver on the net-zero carbon reduction target under its overarching spatial strategy and strategic policies. The Cycling Framework will help support the delivery of NPF4 strategic policies 7 (Local living) and 10 (Sustainable Transport). Impact assessments have been produced and are available [here](#).

The Second Strategic Transport Projects Review (STPR2) will provide a suite of transport interventions intended to deliver the outcomes of NTS2 over the coming two decades. STPR2 will include a raft of active travel interventions which are likely to be delivered, in part, via the delivery mechanisms proposed in the Cycling Framework. Impact assessments have been produced and are available [here](#).

2. Consultation Overview

2.1 Consultation form

A consultation survey form (see Appendix A) was developed to capture a combination of quantitative and qualitative information, allowing respondents to share their views on the impact assessment screening reports and provide feedback to inform the development of the Cycling Framework.

One survey form was created with each impact assessment addressed through a specific section of the form. It was recognised that some of the survey questions would not be directly relevant to all, and therefore, respondents were encouraged to comment on the specific strategic policies of most relevance with the opportunity to skip questions.

The survey form adhered to best practice principles of survey design following guidance available from Delib and the Scottish Government. It was designed to be compliant with the General Data Protection Regulations (GDPR).

2.2 Consultation dates and duration

The consultation was open to the public and stakeholders from the 26th September to the 19th December 2022. The consultation was carried out over this period to give respondents adequate time to review the impact assessment reports and consultation form and provide their responses.

2.3 Methods of responding

The consultation form was accessible online via the Scottish Government's consultation hub, Citizen Space.¹ Consultees unable to complete the consultation using online methods were given the option of alternative means by contacting Transport Scotland. Respondents were made aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to the consultation. Respondents were directed to the Scottish Government's [privacy policy](#) for information on how personal data would be handled as part of this consultation.

2.4 Responses

Overall, the consultation received a total of 68 responses across the SEQIA, ICIA and BRIA assessments. The split across the three assessments was as follows:

- SEQIA - 37 responses;
- ICIA - 14 responses; and
- BRIA - 17 responses.

Though the majority of respondents did not consent to their details being published, comments were received from a wide range of individuals, organisations and across a broad selection of actions within the Framework. All comments received in response to the three impact assessments are listed in Appendix A. Those who chose not to be identified are listed as "withheld", while organisations who consented to being identified are listed below:

- Aberdeen City Council
- MRC/CSO Social and Public Health Sciences Unit
- Mobility and Access Committee for Scotland
- Sustrans Scotland
- MRC/CSO Social and Public Health Sciences Unit
- Edinburgh Access Panel

¹ <https://consult.gov.scot/>

2.5 Survey analysis

At the end of the consultation period, completed consultation forms were reviewed and any confidential information redacted by Transport Scotland, in line with GDPR requirements. All email responses were also uploaded to Citizen Space.

Consultation analysis has focused on the qualitative feedback received. This has involved reviewing each submission individually, identifying and categorising the points raised in feedback and taking actions relevant to the assessment.

3. Summary of Responses

This section sets out a summary of feedback from the consultation, highlighting the main issues raised, a full record of responses and actions taken is contained in Appendix A.

Within the SEQIA, ICIA and BRIA respondents answered the following question on the basis of their review of each draft IA:

- *“Do you have any comments on the draft Social and Equalities Impact Assessment / Business Regulatory Impact Assessment / Island Communities Impact Assessment?”*

3.1 SEQIA Feedback

The SEQIA consultation feedback covered a range of issues, with one of the most common being concerns regarding disabled users and how cycling infrastructure may negatively impact their ability to travel safely.

- This concern was voiced by the Mobility and Access Committee for Scotland who highlighted creation of “additional pavement clutter” resulting from infrastructure such as bus stop bypasses which may put disabled people in the path of cyclists while accessing buses. As such, there is a suggestion that individual safety amongst disabled and other protected characteristic groups may be negatively impacted, an issue raised by multiple respondents citing the fact that people may face restricted accessibility to key services.
- Sustrans Scotland and Aberdeen City Council also highlighted the need to account for disabled people's needs but indicated that proposed actions aimed at making the ETRO and TRO process more efficient would help to remove barriers to active travel for disabled and non-disabled people alike, while retaining the opportunity for consultation.

In addition, questions, and comments regarding the impact of cycle paths on the local environment were raised with particular focus on local habitats.

- In relation to the local environmental impact, one respondent noted the specific impact of recreational cycling on litter which is said to have increased since the Covid-19 pandemic with a need for litter collectors to be deployed to mitigate against negative impacts on pathways and local wildlife.

Multiple responses focus on the concern that women are not actively identified as a key group within the Framework.

- A respondent noted the fact that women are less likely to meet recommended physical activity levels and less likely to cycle due to safety concerns, leading to suggestions that cycling investment may only benefit those who already cycle the most.
- Sustrans Scotland note that improved safety is of particular benefit to women and young adults when choosing to cycle. Therefore, actions within the framework aimed at making it easier to switch to cycling and help remove safety related barriers are welcomed.

3.2 ICIA Feedback

In the ICIA feedback, multiple responses focused on the concern around the quality of active travel infrastructure which is negatively impacting some vulnerable groups and a need to further advance the road and path quality across the islands to ensure women feel safe and comfortable to take part in active transport.

- Safety amongst women is raised as a concern with a group of respondents noting the lack of sufficient sports and exercise facilities meaning walking and cycling are the key methods for staying active. However, the lack of dedicated pathways is said to discourage women in island areas and as such is creating a barrier to active travel.
- Respondents also highlighted safety concerns for families with young children with one comment noting that friends in a rural area have had to “fight to get the school bus to pick the kids up at a safe spot, they were having to stand on the verge with traffic going by at 60mph”

3.3 BRIA Feedback

The BRIA consultation feedback included concerns related to additional regulations on businesses and the ability to access businesses by car, particularly for disabled drivers.

- One respondent noting that there is not enough focus on disabled access for work or leisure travel. In support of this, a further respondent indicated the need to ensure that car accessibility to businesses remains straightforward particularly for disabled groups.

Furthermore, the subject of physical inactivity is raised in relation to the systemic nature of public health interventions.

- The MRC/CSO Social and Public Health Sciences Unit stated that the rationale for intervention may be strengthened by an acknowledgement of the evidence beyond climate issues and 'market failure', highlighting from the systemic nature of the physical inactivity issue.

Cycling UK highlighted that the effects of a more efficient TRO/ETRO process should not be seen as necessarily detrimental to business but highlighted that increased active travel could provide highly positive outcomes for local highstreets and business.

Appendix A Consultation Responses and Actions

A.1: SEQIA Responses

Name/ Organisation	Comment/Feedback	Actions
Jill Belch	This will help assuage inequalities as most people living along polluting road in lower SIMD and may not even own a car.	The assessment highlights that actions within the Cycling Framework have the potential to address some of the determinants of health inequalities by reducing traffic and improving access to alternatives. Evidence in support of this is outlined in Section 3.2
Withheld	I trust that any new cycle paths will not interfere with local wildlife. Also, I suspect that the local authority will need several full-time litter collectors - as evidenced from the recent pandemic - recreational cycling seems to produce an abundance of litter.	A Strategic Environmental Assessment (SEA) Screening exercise has been completed and submitted to the SEA gateway. Screening assessment determined that a full SEA is not required of the Cycling Framework. However, Transport Scotland expect all partners to conduct an applicable assessment of environmental impacts associated with any active travel planning or project. There would also be an expectation that any likely significant effects identified through these processes would be monitored proactively at the plan and project level
Withheld	Many policies such as National Planning Framework 4 and others position Loch Lomond and Trossachs National Park as a key green/bluespace destination for large parts of the Central Belt - yet access by active and sustainable transport is currently not available, accessible and affordable by the majority - so is unlikely to be an inclusive destination. Fully integrated multimodal network approach is required.	Noted
Withheld	Keep locals informed and listen to their views	Noted

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>The Impact assessment confirms that currently, the level of cycling is disproportionately high among white, non-disabled, young-to-middleaged men. The hypothesis that increasing the amount of dedicated cycling infrastructure will particularly benefit under-represented groups needs to be properly and objectively tested: it may be that instead, those who already cycle are the main beneficiaries.</p> <p>The EqIA needs to recognise that some disabled people find aspects of cycling infrastructure (eg bus stop bypasses) highly problematic.</p>	<p>Action within the Framework to: “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”, has been assessed as providing a positive impact in this regard and recognition of the specific needs of disabled users has been highlighted in the assessment, with specific reference to measures such as bus stop bypasses.</p>
Neil Scoffield	<p>Does the assessment include the shortfall in financing for local authorities?</p>	<p>Funding to implement not directly related to equality impacts, though the action to allocate 10% of the transport budget is included within the Framework.</p>
Withheld	<p>It has proved to be a great mode of public transport in more advanced countries, delivering benefits to social aspect of life, health in all forms , local finance , happiness levels , crime reduction and so on. Stop the bureaucracy, deliver quality active infra ASAP & of a good, smooth, quality</p>	<p>Final Cycling Framework and delivery plan will set out the priorities for investment over the next 5-10 years</p>
Withheld	<p>Yes, current state of infrastructure is discriminative against families , pensioners , disabled , children and so on .</p> <p>we need to catch up with Europe , as we are lagging behind at least 30/40years</p> <p>please deliver smooth , linked up , high quality , well designed , SAFE infra for everyone to enjoy .</p>	<p>Action within the Framework to: 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, has been assessed as providing a positive impact in this regard and recognition of the specific needs of disabled users has been highlighted in the assessment.</p>
Withheld	<p>Disability and affordability issues should not exclude people being able to cycle. Cycle library would be great. Lots of bicycle and recycling groups would be able to help.</p>	<p>Actions within the Fair Access theme address access to bikes for a range of people including the action to: Expand access to cycles, including adaptive cycles, e-cycles and cycle share</p>
Withheld	<p>Too much focus on cycling and not enough focus on disabled access and the right infrastructure to support their travel. Let’s get disabled people more easily to their work or holidays and, in turn, that should also benefit cyclists and other road users.</p>	<p>Actions within the Fair Access theme address access to bikes for a range of people including the action to: Expand access to cycles, including adaptive cycles, e-cycles and cycle share</p>

Name/ Organisation	Comment/Feedback	Actions
Withheld	The majority of responses you will get will be from cyclists as it's doing the rounds in cycling chats. The mass majority of people will not even know you are consulting, then you will say you have consulted and got say 80% in favour, it's a tick box exercise, no more equality than fly in the air.	Noted
Jon Jewitt	Why do we need an impact assessment when we know what the impact would be. Look at the Netherlands...! Just look at what they have achieved and copy them. Don't spend half the budget on thinking about what we need to do. Just do it. Spend the money on the ground, not glossy brochures.	Noted
Withheld	The SEqIA is wholly inadequate and does not appear to have actually involved any people with protected characteristics; this is especially relevant to disabled people. Many (but not all) disabled people find cycling infrastructure problematic for example by reducing parking options and introducing pedestrian/cyclist conflict in shared spaces and at bus stop bypasses. It is also well-established that disabled people, women and some other groups cycle much less than non-disabled men. There is a risk that investment in cycling infrastructure will disproportionately benefit those who already cycle the most, especially non-disabled, professional men.	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here. The needs of disabled users is highlighted in the assessment of the action relating to design guidance development, with specific reference to measures such as bus-stop bypasses. The protection of consultation rights has been asserted under the actions relating to changes to the TREO/ETRO and compulsory purchase actions.
Withheld	the assessment does not seem to have followed through with respect to other users and in particular pedestrians	Action within the Framework to: 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, has been assessed as providing a positive impact in this regard.
Withheld	Yes, it does not deliver anything for the many and should not impact anyone it will not help. The money needs to be spent on more important things like eating and heating. Stop pretending it's for 'everyones' benefit when it clearly is not	Noted
Graeme Robertson	These are not in line with bageism and discrimination aims	The evidence presented in support of the assessment process suggests older people and children benefit due to emission reduction and helps ethnic minorities who tend to live in more car dependant/heavily trafficked areas, making these safer for active travel

Name/ Organisation	Comment/Feedback	Actions
		improves inclusivity. Potential negative impacts arising from inappropriate design or reduction in consultation has been highlighted in the assessment.
Withheld	Equality means seeing more groups involved to keep this fair and inclusive	all protected characteristic groups are considered
Withheld	The assessment does not consider the differences between rural and urban areas when assessing social and equality impacts.	The potential for differential impacts on rural communities has been considered within the ICIA and, the potential for urban centric policies has been highlighted in this respect.
Withheld	Has this even taken disabilities into account? All measures introduced thus far would suggest not	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here. The needs of disabled users is highlighted in the assessment of the action relating to design guidance development and the protection of consultation rights has been asserted under the actions relating to changes to the TREG/ETRO and compulsory purchase actions.
Withheld	It's bizarre that to reduce car usage the assessment suggests that space for cyclists should be increased when cyclists are entitled to the same space as other vehicles. Prioritising cycling discriminates against those who are unable to cycle - hence why it's better to share space instead of aiming for segregation	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here. The needs of disabled users is highlighted in the assessment of the action relating to design guidance development and the protection of consultation rights has been asserted under the actions relating to changes to the TREG/ETRO and compulsory purchase actions.
Withheld	I haven't read these but my experiences of this type of thing are too fierce disabled people to comply with new schemes rather than asking ALL disabled people what they need. Until now there has been a thirst to install schemes without much thought about disabled people, their needs or equality laws with an attitude of let's see what we can get away with attitude.	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here. The needs of disabled users is highlighted in the assessment of the action relating to design guidance development and the protection of consultation rights has been asserted under the actions relating to changes to the TREG/ETRO and compulsory purchase actions.

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>> There is evidence that cycle training increases the skill and confidence of trainees and may result in increased frequency of cycling after training. However, consideration of the barriers to child cycling suggests that cycle training alone is unlikely to result in more cycling</p> <p>Glad to see this point being stated so clearly. Training is probably worthwhile for kids, especially those completely new to cycling, but all the training in the world can't keep you safe from drivers.</p>	Noted
Withheld	Minor negative effects have been identified in Cl.6, Cl.8, & Cl.11 relating to loss of opportunity for consultation. How will these be mitigated?	<p>Assessment has been updated to include recommendation that wording be added to protect opportunities for consultation are retained, in-line with Scottish Government Guidance.</p> <ul style="list-style-type: none"> • https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/
Withheld	We acknowledge that the SEQIA report has included women and their concerns within their assessment, however it is worrying that women are not actively discussed during this consultation. The SEQIA report states that women are less likely to meet their recommended physical activity levels, and women are less likely to ride a bicycle due to concerns over their safety. Therefore, we must question why a gendered lens has not been utilised throughout the proposed plans, and actively urge the Scottish Government to reconsider.	Impact assessment shows that proposed actions such as Cl.1 active travel strategies could include policies and infrastructure directly targeted at these underrepresented groups such as segregated infrastructure (Cl.3), supporting Scottish Road Safety Framework (Cl.20) and improved access to bikes through bike share (FA.1)

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>The Social and Equalities Impact Assessment is good at highlighting both problems and opportunities that the actions produced could create, the following three comments are worth making.</p> <ul style="list-style-type: none"> > Cl.6 & Cl.8 recognise the demands of the blind and partially sighted population, when creating new infrastructure, which can disrupt their known behaviours. Therefore, it is important to do as much as possible in a scenario to make sure that new areas are safe spaces for those with a visual impairment, especially in the dense urban areas where this will be particularly important in order to keep blind and partially sighted citizens safe. > The colour code on Cl.13 is wrong, it has been put down as minor negative but is shaded in light green so this should be amended. However, the points made in the section are valuable as safety in rural communities is something that has to be addressed sufficiently. > FA.2 highlights the potential of improving fair accessibility to areas of deprivation to have access to cycling opportunities. It is good to see it highlighted that 40% of low-income households in the UK have no access to a private vehicle. For those that do have access in low-income households, it can be a necessity but a significant financial burden. With the current cost of living, it is important to do as much as possible to increase cycling opportunities for the most financially disadvantaged in our societies. 	<p>The needs of disabled users is highlighted in the assessment of the action relating to design guidance development and the protection of consultation rights has been asserted under the actions relating to changes to the TRO/ETRO and compulsory purchase actions.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
Withheld	<p>Fellows agree that the plan has the potential to tackle inequalities. One Fellow emphasized that most people living along polluting roads located in more deprived areas identified in the Scottish Index of Multiple Deprivation may not even own a car.</p>	<p>Action point against Cl.7 emphasising pollution exposure and low car ownership among low income groups</p>

Name/ Organisation	Comment/Feedback	Actions
Aberdeen City Council	<p>The wording of the actions subject to assessment does not match the wording of the actions in the overarching consultation document. While this is unlikely to impact on the overall assessment outcomes, consistency in the wording of the actions would be expected.</p> <p>Cl.6 and Cl.8 – assessment should balance the negative impacts mentioned with the positive impacts to various groups likely to accrue as a result of a speedier implementation of infrastructure.</p> <p>Cl.11 – again perhaps needs balanced with the positive impacts likely to accrue to various groups as a result of a speedier implementation of infrastructure.</p> <p>Cl.13 – ‘Minor negative’ rating does not match the narrative or colour-coding.</p>	<p>Wording corrected and assessment cross checked against previous order of actions. As noted, the outcome of the assessment is not significantly altered.</p> <p>Assessment has been updated to include recommendation that wording be added to protect opportunities for consultation are retained, in-line with Scottish Government Guidance, while noting possible benefits of more timely delivery.</p> <ul style="list-style-type: none"> • https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/
Mobility and Access Committee for Scotland	<p>The Equality Impact Assessment fails to adequately recognise that some cycling facilities can have a negative effect on some disabled people. Examples of some of the barriers include additional pavement clutter that can be difficult to detect and or manoeuvre around, ‘bus stop bypasses or boarders’ which put some disabled people in the path of cyclists whilst trying to get on or off buses, shared spaces where some disabled people have no traditional physical guidance (e.g. pavements, controlled crossings) to know what areas they are on. Often cycle lanes replace accessible car parking provision for blue badge holders.</p> <p>The Impact Assessment should explicitly recognise these negative impacts so that they can be addressed, acknowledged and mitigated. The promotion of cycling should not have a negative impact on some disabled people’s ability to navigate their local areas.</p>	<p>The needs of disabled users are highlighted in the assessment of the action relating to design guidance development, with specific reference to measures such as bus-stop bypasses. The protection of consultation rights has been asserted under the actions relating to changes to the TREO/ETRO and compulsory purchase actions.</p>
Withheld	<p>Disabled cannot ride bikes. The elderly and children cannot ride bikes easy due to balance issues and other limiting factors.</p> <p>The poor cannot afford a bike.</p> <p>Women in most dresses and skirts (nor men in these clothes) can ride a bike without ripping clothes.</p> <p>This policy really only favours able bodied, affluent men in their 20s to early 50s!</p>	<p>Many actions have positive impacts for disabled, women and low income groups by making cycling more inclusive.</p> <p>Evidence suggests otherwise for business impact</p>

Name/ Organisation	Comment/Feedback	Actions
Sustrans Scotland	<p>We would welcome statistics on race that are specific to Scotland. While the English example gives a good overview of the issues, having Scotland-specific statistics would help in planning.</p> <p>Sustrans welcomes the recognition that safety is one of the main issues when choosing to cycle, especially for children and young adult. We would also add women as a group particularly concerned about safety when choosing a transport mode. Convenience also plays an important role, with women making a lot more of the last mile journeys and multi-stop trips.</p> <p>Regarding the ETROs change process, we absolutely recognise that this needs to account for disabled people's needs. We would like to highlight that an ETRO process where the changes can be made quickly will benefit disabled people as changes can be done rapidly to accommodate their needs.</p> <p>Regarding socio-economically disadvantaged groups, studies have shown that the main way to change transport habits is access to affordable and reliable public transport. The integration of active travel infrastructure with public transport is key to encourage people from low-income households to cycle.</p>	<p>Evidence gathered to support the assessment, and reference within the assessment table, are UK-based and, wherever available, specific to Scotland.</p> <p>Noted, this is referenced in the evidence review in Section 3.1.</p> <p>Assessment has been updated to include recommendation that wording be added to protect opportunities for consultation are retained, in-line with Scottish Government Guidance, while noting possible benefits of more timely delivery.</p> <ul style="list-style-type: none"> • https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/ <p>Noted, this is referenced in the evidence review in Section 3.2.</p>
MRC/CSO Social and Public Health Sciences Unit	<p>25.1 Numerous socio-demographic factors are associated with physical activity levels. Currently, this impact assessment lacks consideration of sexual orientation, gender identity, or occupation. The PROGRESS-Plus framework, as applied to physical activity (e.g. Rigby, 2020), may be useful to consider the different strata against which to base this impact assessment.</p>	<p>The methodology outlined in Section 2.4 ensures that each action is checked against potential impacts on any relevant groups/populations. The assessment also highlights that actions within the Cycling Framework have the potential to address some of the determinants of health inequalities by reducing traffic and improving access to alternatives. Evidence in support of this is outlined in Section 3.2. The PROGRESS_Plus framework is noted as a useful reference in cross checking the assessment.</p>
Withheld	<p>To be effective the SEQIAs must hold significant weight in the process and their implementation must be regularly reviewed to ensure that their intention of ensuring equitable access and no discriminatory impacts is being delivered.</p>	<p>Noted</p>

Name/ Organisation	Comment/Feedback	Actions
Withheld	How will the draft Social and Equalities Impact Assessment consider whether the Active Travel interventions have delivered water resilience?	A Strategic Environmental Assessment (SEA) Screening exercise has been completed and submitted to the SEA gateway. Screening assessment determined that a full SEA is not required of the Cycling Framework. However, Transport Scotland expect all partners to conduct an applicable assessment of environmental impacts associated with any active travel planning or project. There would also be an expectation that any likely significant effects identified through these processes would be monitored proactively at the plan and project level
Withheld	We note that disabled people are more likely to express concerns about the impact of cycling infrastructure on their ability to travel safely, in particular by walking/ wheeling and when using public transport. We would like to see consideration of the particular importance of considering and including disabled people both as cyclists and otherwise when planning infrastructure and investment.	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here. The needs of disabled users is highlighted in the assessment of the action relating to design guidance development and the protection of consultation rights has been asserted under the actions relating to changes to the TREO/ETRO and compulsory purchase actions.
Edinburgh Access Panel	Please ensure protected characteristics groups are involved in developing impact assessments and the assessments are published.	The assessment has drawn on consultation from a wide range of stakeholders and the public, including the feedback provided here.
Kenneth law	You are not taking the impact that this policy will have on our elderly people into consideration . It is unfair that elderly people will just have to like it or lump it.	Measures to improve cycling will positively impact on traffic noise and air pollution and connections to public transport (older people more vulnerable to this) in Cl.4, Cl.17, Cl.18, ER.1, FA.3, FA.4, TE.1, NPM.1) Action Cl.20 improving safety will remove a barrier older people feel towards cycling

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>As a regular cycle commuter (over the age of 56) I am not surprised by the evidence of vulnerability to traffic as cars have been allowed to dominate for too long in the UK and this has had a particularly nefarious effect on the economically disadvantaged. For the physically disadvantaged, segregated cycle paths offer more travel options and this can be observed in The Netherlands. It is a sad reflection on our society that cycling has become the preserve of middle-class/income youngish men, and this has to change.</p> <p>Cycling has to have advantages over driving and given priority where possible, for example the negation of one-way streets/roads for cycles and lights which allow faster departure for bikes at crossings.</p> <p>Cycling reduces expenditure on buses, which have become expensive in my city and cycle maintenance could be taught at schools and colleges to make cycling more affordable too</p> <p>Cycle storage is very important for older groups who often lose strength with age. In Scotland, due to the prevalence of tenements, no bike storage often means carrying your bike up a staircase at the end of your journey. This is challenging for any group with less upper body strength.</p> <p>Rural roads are just too frightening for me, and this means I cannot visit a friend who live in the countryside. The distance is not a problem, but the speed and proximity of the cars is.</p> <p>There is too little cycle parking in the suburbs, so nowhere to secure your bike when visiting a friend.</p>	<p>Action CI.3 states cycling infrastructure in every town and city will be "separate from traffic" with positive impacts on inclusivity and feeling of safety for vulnerable groups.</p> <p>Action TE.1 is a comprehensive cycling training programme with positive impacts on currently low cycling groups</p> <p>Action CI.10 is for appropriate cycling storage for every household</p> <p>Action CI.13 is designation of quiet roads/cycle friendly roads in rural areas</p>

A.2: ICIA Responses

Name/ Organisation	Comment/Feedback	Actions
Withheld	There needs to be specific co-design activities and support for Island and Rural Communities	The ICIA assessment highlights the potential impacts on island communities of approach to network planning which is potentially more suited to dense urban centres. Assessment recommends specific provision for rural and island communities should be considered within the Cycling Framework.
Withheld	Needs to have some assessment on whether the proposed intervention will help deliver water resilient places or make it harder / more expensive to deliver water resilient places in the future.	A Strategic Environmental Assessment (SEA) Screening exercise has been completed and submitted to the SEA gateway. Screening assessment determined that a full SEA is not required of the Cycling Framework. However, Transport Scotland expect all partners to conduct an applicable assessment of environmental impacts associated with any active travel planning or project. There would also be an expectation that any likely significant effects identified through these processes would be monitored proactively at the plan and project level
Withheld	It has proved to be a great mode of public transport in more advanced countries, delivering benefits to social aspect of life, health in all forms, local finance, happiness levels, crime reduction and so on. Stop the bureaucracy, deliver quality active infra ASAP & of a good, smooth, quality	Further details of the evidence for cycling interventions are contained within the SEQIA and the final Cycling Framework and delivery plan will set out the priorities for investment over the next 5-10 years
Withheld	Have island communities been involved in developing the draft assessment?	The process for developing the assessment is outlined in Section 2. There have opportunities for stakeholder and public input into the process at re-screening, screening and assessment stages. During this process feedback has been received from local authorities with island communities and RTPs representing island areas. The assessments have been updated and adapted accordingly.
Tim King	This always neglects rural, coastal communities.	Though the ICIA focuses solely on island communities, the assessment acknowledges problems of transport poverty in both rural and island communities identified within the evidence review and seeks to mitigate these through additions or changes to the Cycling Framework.
Withheld	Too much focus on cycling and not enough focus on disabled access and the right infrastructure to support their travel. Let's get disabled people more easily	Access to adaptive bikes is referred to under the theme of 'Fair Access' and further scrutiny of all policies in regard to disabled access is incorporated into the SEQIA.

Name/ Organisation	Comment/Feedback	Actions
	to their work or holidays and, in turn, that should also benefit cyclists and other road users.	
Jon Jewitt	Why do we need an impact assessment when we know what the impact would be. Look at the Netherlands...! Just look at what they have achieved and copy them. Don't spend half the budget on thinking about what we need to do. Just do it. Spend the money on the ground, not glossy brochures.	Noted
Withheld	What waste of time can't even get a bus or demand transport I'm not cycling 6 miles on the winding road as I can't physically do so anyway. Never mind bicycles try something with four wheels we are completely isolated.	Improving public transport in rural areas is outside the scope of the cycling framework. However, links to public transport and carriage of bikes on buses and trains are included as actions within the framework.
Paul Bailey	"Island communities may be either positively or negatively impacted by this proposed action, if any changes to the TRO process result in alteration to the level of consultation required." When SpacesforPeople measures were installed, we were promised that there would be consultation because a TRO had to have consultation. Now it appears that is not the case. Absolutely unforgivable to put out a questionnaire like this with no links	Assessment has been updated to include recommendation that wording be added to ensure opportunities for consultation are retained, in-line with Scottish Government Guidance: https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>CI.11 is listed as having "uncertain" impact; suggest this should be minor negative as stated in the comments/evidence: "Fast-track powers which do not include a sufficient element of consultation and engagement with local communities, including crofters could have potentially significant negative impacts."</p> <p>CI.12 is listed as having "uncertain" impact; suggest this should be major negative as stated in the comments/evidence: "This action has the potential to impact island communities by favouring an approach to network planning which is more suited to dense urban centres, unless specific provision island communities is considered."</p> <p>CI.15 is similarly listed as having "uncertain" impact; suggest this should also be major negative as stated in the comments/evidence: "This action has the potential to impact island communities by favouring an approach to network planning which is more suited to dense urban centres, unless specific provision island communities is considered."</p> <p>NPM.1 is listed as having "uncertain" impact; suggest this should be minor positive, as many short distance car trips are made in island communities which could be made on foot or by bicycle if people across the country were encouraged to question their travel choices.</p>	<p>Assessment scores relating to consultation have been reviewed for consistency and updated to "Minor Negative" on application of mitigation that wording be added to ensure opportunities for consultation are retained, in-line with Scottish Government Guidance: https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/</p> <p>The ICIA assessment highlights the potential impacts on island communities of approach to network planning which is potentially more suited to dense urban centres. Assessment recommends specific provision for rural and island communities should be considered within the Cycling Framework.</p> <p>As above.</p> <p>Agree, have updated score and wording in the assessment.</p>
Withheld	<p>We are pleased to see the inclusion of island communities, as women from the Scottish islands have explained that transport infrastructure is poor. They have highlighted that the islands have poorer sports and exercise facilities, and as such walking, running, and cycling are key methods to stay active. However, due to a lack of walking or cycle paths which avoid main roads, or go through areas of natural beauty, they are prevented from doing so. It is therefore integral that the Scottish Government work to further advance the road and path quality across the islands to ensure women feel safe and comfortable to take part in active transport.</p> <ul style="list-style-type: none"> • "With this new healthcare hub they're talking about, they're going to take 	<p>Impact assessment demonstrates that active travel strategies could include policies and infrastructure directly targeted at these underrepresented groups such as segregated infrastructure, supporting Scottish Road Safety Framework and improved access to bikes through bike share.</p>

Name/ Organisation	Comment/Feedback	Actions
	<p>away the swimming pool...we just have so few ways to stay fit here.”</p> <ul style="list-style-type: none"> • “They’re telling us to get more active by walking, but we don’t have any safe paths. Also, we get lots of people visiting to cycle on the island – but no cycling routes? That just means there’s more likely to be an accident.” • “I know friends of mine who live really rurally and have kids, they’ve had to fight to get the school bus to pick the kids up at a safe spot, they were having to stand on the verge with traffic going by at 60mph” 	
Withheld	<p>The Island Communities Impact Assessment is strong in highlighting the benefits and concerns that could be felt across Scotland within the context of our Island communities. Whilst also highlighting specific benefits and concerns that are unique to Island communities such as the following three examples which are worth discussing:</p> <ul style="list-style-type: none"> > CI.7 is a strong point as it highlights the benefits that could make a difference for those living in the Isle of Skye. The ability to include more cycle network could have a positive impact on tourism to the Isle of Skye. > FA.3 is good as it recognises the importance of local bus networks to island communities. It mentions how there is a need to consider impact on passenger capacity on busy routes at the same time. Therefore, it is important to support small private operators to help them benefit from increased provision for cyclists rather than feel overwhelmed, especially in tourism season. > It is encouraging to see the recognition of the complex travel patterns that island communities have with reaching educational facilities. Perhaps increased emphasis could be made for multi-modal trips if that is possible in a scenario. 	Noted
Aberdeen City Council	The wording of the actions subject to assessment does not match the wording of the actions in the overarching consultation document. While this is unlikely to impact on the overall assessment outcomes, consistency in the wording of the actions would be expected.	Wording corrected and assessment cross checked against previous order of actions. As noted, the outcome of the assessment is not significantly altered.

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>We welcome the recognition that local circumstances on islands are different from the rest of the country, and that cycling needs differ compared to the rest of Scotland. We would like to see more recognition of the need for integration of public transport and cycling infrastructure, which would encourage diversion from car use for everyday journeys.</p> <p>We welcome the inclusion of tourism as an asset for island communities. Tourist cycling routes are a good example of support infrastructure in rural areas and could also be used for everyday journeys as they are also accessible to locals.</p>	<p>The ICIA assessment highlights the potential impacts on island communities of approach to network planning which is potentially more suited to dense urban centres. Assessment recommends specific provision for rural and island communities should be considered within the Cycling Framework. Improving public transport in rural areas is outside the scope of the cycling framework. However, links to public transport and carriage of bikes on buses and trains are included as actions within the framework.</p> <p>The potential value of cycle tourism to island communities is highlighted in Section 3.4 and assessment of the creation of cycling strategies.</p>

A.3: BRIA Responses

Name/ Organisation	Comment/Feedback	Actions
Withheld	I fear they will be used by bad actors to frustrate and delay the process as with CCWEL. Mechanisms must be put in place to not allow a handful of spurious objections to derail progress for the many	Adequate provision for consultation and input into active travel projects, in line with Scottish Government guidance, has been referenced in order to ensure opportunity to gather a balance of opinions.
Withheld	It has proved to be a great mode of public transport in more advanced countries, delivering benefits to social aspect of life, health in all forms, local finance, happiness levels, crime reduction and so on. Stop the bureaucracy, deliver quality active infra ASAP & of a good, smooth, quality	Further details of the evidence for cycling interventions are contained within the SEQIA and the final Cycling Framework and delivery plan will set out the priorities for investment over the next 5-10 years
Withheld	Too much focus on cycling and not enough focus on disabled access and the right infrastructure to support their travel. Let's get disabled people more easily to their work or holidays and, in turn, that should also benefit cyclists and other road users.	Access to adaptive bikes is referred to under the theme of 'Fair Access' and further scrutiny of all policies in regard to disabled access is incorporated into the SEQIA.
Jon Jewitt	Why do we need an impact assessment when we know what the impact would be. Look at the Netherlands...! Just look at what they have achieved and copy them. Don't spend half the budget on thinking about what we need to do. Just do it. Spend the money on the ground, not glossy brochures.	Purpose and rationale for the BRIA is contained in Section 1.3.
Daniel Trotter	Be wary of unfounded opinions about active travel infrastructure having a negative impact on business. The opposite has been shown the case from studies conducted worldwide SEE https://www.highstreetstaskforce.org.uk/resources/details/?id=07ec60d8-8884-4859-ad49-f2ade6bd8972	The assessment relates to the possible impacts of removing or truncating the TRO/ETRO process, rather than the implementation of cycle friendly infrastructure which, as commented, may have positive impacts on businesses. Positive impacts of cycling on businesses are noted in the assessment as follows: "Cycling Framework are expected to have a broadly positive impact on business, by encouraging local journeys to small retailers and the high-street, as opposed to out of town shopping centres, which are more easily accessed by car."

Name/ Organisation	Comment/Feedback	Actions
Withheld	I fear more businesses will suffer and the moment looks like it's about money building exercises with fresh air being thrown in	Potential negative impacts on businesses are noted in the assessment: "Some businesses, sectors, markets, products or services may be affected by the infrastructure provision for active travel if, for example, it removes space for other travel modes (adverse effect) or improves access for a wider range of employees and consumers (positive effect). Micro and small businesses may be more vulnerable to any potential adverse effects."
Withheld	Clearly a biased report not grounded in reality and taking inspiration from areas with climates more suited to cycling	Evidence gathered to support the assessment, and reference within the assessment table, are UK-based and, wherever available, specific to Scotland.
Withheld	I hope that these will not place additional regulations on businesses to make them more expensive to run and that customers are able to access businesses with a car. Especially disabled drivers.	Potential negative impacts on businesses are noted in the assessment: "Some businesses, sectors, markets, products or services may be affected by the infrastructure provision for active travel if, for example, it removes space for other travel modes (adverse effect) or improves access for a wider range of employees and consumers (positive effect). Micro and small businesses may be more vulnerable to any potential adverse effects." Potential impacts on disabled drivers have been assessed as part of the SEQIA.
Withheld	This illustrates the problem of throwing money at random infrastructure projects without considering how they link together. It would be considered crazy to build isolated stretches of a few hundred metres of motorway, yet until very very recently that's precisely what has been done with most cycle infrastructure. I am tentatively hopeful for the developing/planned network in Glasgow with the South City Way, Garscube Road, St Georges Road, Woodlands, Byres Road, Queen Margaret Drive etc, but that's still far from being completed and it's that kind of large scale integrated design that should be the goal for new development.	Noted

Name/ Organisation	Comment/Feedback	Actions
Withheld	<p>Minor negative effects identified in Cl.6, Cl.8 & Cl.11, again relating to reduced opportunity for consultation and engagement; how will these be mitigated?</p> <p>FA.3 relating to smaller private, rural and island bus operators accessing funding to meet additional requirements also has a minor negative effect which could be a major effect if it affects the viability of already marginal services. Any funding available must be straightforward to access and any requirement to carry cycles must be developed in collaboration with operators.</p> <p>TE.5 relating to alternatives to school bus; in rural areas free school transport is not usually provided within 1.5 - 2 miles of the school & distances beyond this are not conducive to active travel. How will impact on smaller operators and communities be mitigated, when the school bus is often the only bus service provided in a rural community?</p>	<p>Assessment has been updated to include recommendation that wording be added to ensure opportunities for consultation are retained, in-line with Scottish Government Guidance: https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/</p> <p>Assessment has been updated to include recommendation for requirement that cycle carriage is developed in collaboration with bus operators.</p> <p>The action relating to replacement of bus services has been removed from the Framework.</p>
Withheld	<p>The draft Business Regulatory Impact Assessment is detailed and explains well the possible implications of the new framework and delivery plan. Three points that are notable are:</p> <ul style="list-style-type: none"> > The framing of cycling infrastructure as a market is intriguing and is a unique way to talk about future plans. This change of language implies more as a business opportunity rather than one simply of getting more people cycling in our villages, towns, and cities. > The recognition of the role and potential negative impact on the bus sector is good to see, especially around smaller private companies which may be the lifeblood of communities. It is important that they get the support they need to help keep them going whilst also supporting them to be part of a more integrated approach with cycling and active travel in the communities they serve. > The impact that new infrastructure could have on tourism is a positive too. It would be interesting to build on this and find out what is needed to make places attractive to visit for those who are thinking of having a cycling holiday in Scotland. 	<p>Noted, assessment of impacts on bus operators updated in line with the above.</p>

Name/ Organisation	Comment/Feedback	Actions
Withheld	As I understand it, this doesn't currently include an Environmental Impact Assessment. This is essential.	A Strategic Environmental Assessment (SEA) Screening exercise has been completed and submitted to the SEA gateway. Screening assessment determined that a full SEA is not required of the Cycling Framework. However, Transport Scotland expect all partners to conduct an applicable assessment of environmental impacts associated with any active travel planning or project. There would also be an expectation that any likely significant effects identified through these processes would be monitored proactively at the plan and project level
Aberdeen City Council	The wording of the actions subject to assessment does not match the wording of the actions in the overarching consultation document. While this is unlikely to impact on the overall assessment outcomes, consistency in the wording of the actions would be expected.	Wording corrected and assessment cross checked against previous order of actions. As noted, the outcome of the assessment is not significantly altered.
Withheld	Taking away parking is killing small businesses and discouraging people shopping at hard to reach shops.	Potential negative impacts on businesses are detailed in the assessment: "Some businesses, sectors, markets, products or services may be affected by the infrastructure provision for active travel if, for example, it removes space for other travel modes (adverse effect) or improves access for a wider range of employees and consumers (positive effect). Micro and small businesses may be more vulnerable to any potential adverse effects."
MRC/CSO Social and Public Health Sciences Unit	26.1 Newly published evidence on the health impact of physical inactivity may be considered here (Santos et al., 2022). The rationale for intervention may be strengthened by an acknowledgement of the evidence beyond climate issues and 'market failure'. We encourage you to carefully consider the use of terminology with market connotations (e.g. market failure, and consumers of physical activity), which emphasise individual lifestyle decisions and detract from the systemic nature of the physical inactivity issue (Rigby, 2022ab).	It is acknowledged in the assessment that increasing levels of cycling is a systemic issue and multiple factors must be addressed in a coordinated way, in order to increase uptake of physical activity on a day-to-day basis.

Name/ Organisation	Comment/Feedback	Actions
Cycling UK	<p>We disagree with the assessment that changes to the TRO process (Refs Cl.6 and Cl.8) will negatively impact businesses. Each situation where any sort of TRO is applied has a different impact. Whilst there may be change for some business the consultants should not have concluded that these will be negative. Rather, evidence points to the fact that cycling benefits local economies and local businesses. Cycling UK's Getting There With Cycling report outlines some of the evidence for this, for example, cycle parking delivers 5 times the retail spend per square metre than the same area of car parking.</p> <p>https://www.cyclinguk.org/sites/default/files/document/2022/04/getting_there_with_cycling_stage_3_single_pages_0.pdf</p>	<p>The assessment relates to the possible impacts of removing or truncating the TRO/ETRO process, rather than the implementation of cycle friendly infrastructure which, as commented, may have positive impacts on businesses. Positive impacts of cycling on businesses are noted in the assessment as follows: "Cycling Framework are expected to have a broadly positive impact on business, by encouraging local journeys to small retailers and the high-street, as opposed to out of town shopping centres, which are more easily accessed by car. "</p>

