

Cycling Framework Business and Regulatory Impact Assessment (BRIA)

Screening Report

Transport Scotland

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Quality information

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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).

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.

This report sets out the BRIA assessment of the actions within the Cycling Framework based on existing evidence and previous assessment work.

This report has been updated and expanded, from an initial screening report, following a 12 week period of consultation and the feedback and findings of the consultation will contribute towards completing a full assessment. A record of consultation comments and actions taken in response is provided in Appendix B.

1.2 Cycling Framework and Delivery Plan for Active Travel

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

1. Cut carbon emissions and other pollution
2. Delivering liveable, more pleasant communities
3. Better health and safer travel for all
4. Reducing inequalities - jobs, services, leisure
5. 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](#) 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](#).

1.3 Business and Regulatory Impact Assessments (BRIAs)

BRIAs help to assess the likely costs, benefits and risks of any proposed primary or secondary legislation, voluntary regulation, codes of practice, guidance, or policy changes that may have an impact on the public, private or third sector. The Scottish Government recommends and encourages the completion of a BRIA as best practice to assess the impact of new legislation, as well as other changes such as voluntary guidance or policy changes, even where they do not necessarily present additional obvious burdens. In such cases it can either help confirm understanding that the impact will not change or identify and address unintended impacts which have not been identified. The content of a BRIA should be proportionate to the problem involved and the size of the proposal. A [Business and Regulatory Impact Assessment Toolkit](#) and [Template](#) have been developed to provide guidance and information.

The BRIA will assess the likely impacts, costs, benefits and risks of the Cycling Framework on the public, private or third sector organisations. The information gathered through the consultation process will be used to revise the estimates of any costs and benefits of the actions prepared at the screening stage where applicable.

2. Methodology

2.1 Introduction

The approach for undertaking this BRIA and compiling this assessment report follows a three-stage process:

- **Review of the BRIA toolkit** – a review of guidance and tools to identify the best case approach for assessing the impacts associated with the Cycling Framework;
- **Screening Impact Assessment** – A high level assessment of screening impacts – informed by a consideration of the key issues and evidence.
- **Final Assessment** – Updated screening report with input from a 12 week consultation

2.2 Review of the BRIA toolkit

A review of guidance and the BRIA toolkit has been undertaken to ensure that the overall approach taken ensures that data collected aligns with the requirements of the official BRIA template.

2.3 Screening Assessment

The BRIA screening assessment presents an initial review of each of the strategic policies within the Cycling Framework and provides an initial high-level assessment as to whether the action has potential to differentially or disproportionately affect groups identified through the assessments. It was published for the purposes of consultation to gather responses which has been used to inform the final assessment.

2.4 Final Impact Assessment

This impact assessment is an updated version of the Screening Impact Assessment, with updated assessments for each of the actions under the strategic policies within the Cycling Framework, further informed by consultation responses and any updated sources of evidence. A record of consultation comments and actions taken in response is provided in Appendix B.

The guide questions used to undertake the assessment are outlined below. Where there was not enough information to make a screening assessment, this has been noted within the screening table and has been updated as part of the final assessment following stakeholder engagement as appropriate.

Potential impacts and risks

Businesses

- Will the action/policy have an impact on the competitiveness of Scottish companies within the UK / Europe / globally?
- What are the relevant businesses, sectors, markets, products or services that might be affected by the action?
- Will the action restrict or increase competition in these markets?
 - Will it make it harder for new firms to enter a market?
 - Will it impact suppliers (number / range / competitiveness)?
- Could impacts be different for different parts of an industry or different parts of a supply chain?
- Will micro and small businesses be impacted differently? (Consider regulatory burden, compliance flexibility options, distribution of benefits, cost penalties of non-compliance)

Local authorities

- What is the impact on local authorities?

Consumers – includes users of public services

- Will the quality, availability or price of goods or services in a market be affected?
- Does the action affect the essential services market, such as energy or water?

- Does the action involve storage or increased use of consumer data?
- Could there be increased opportunities for third parties to take advantage of government initiatives to target consumers whose circumstances make them more vulnerable?
- Could the action add complexity in a market, which could lead to information asymmetries or make it more difficult for consumers to understand their rights?
- Could the action affect routes for consumers to seek advice or raise complaints on consumer issues?
- Will it limit the choices and information available to consumers?

Regulators

- What is the impact on regulators?

Organisations in the third sector

- What is the impact on organisations in the third sector?

Environment

- Will there be disproportionate impacts on the environment, including disproportionate cost of compliance and monitoring?

General

- Have any new forms been introduced as a result of the action?

Moving to digital / online

- Does the action take account of changing digital technologies and markets?
- Will the action be applicable in a digital / online context?
- Will the action potentially have an adverse impact on traditional or offline businesses?
- If the action can be applied in an offline and online environment, will this in itself have any adverse impacts on incumbent operators?

Costs and Benefits

- What will the costs and benefits of the action be, relative to the status quo were the action not introduced (i.e. will they be additional and monetised)?

3. Rationale for Intervention

The [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2019](#) sets legally binding net-zero greenhouse gas (GHG) emissions targets of 100% lower than the baseline by 2045 with interim targets for 2030 and 2040 of 75% and 90% reduction respectively. The [Scottish Government \(2021\)](#) report that emissions from transport currently account for approximately 25% of overall GHGs in Scotland. Of these, cars accounted for 39%, goods vehicles contributed 25%, while aviation and shipping accounted for 15% and 16%, respectively.

In the past four decades, car traffic on major roads in Scotland has tripled, with [Transport Scotland](#) recording the highest ever number of vehicle kilometres travelled on all roads in 2019. As such, transport emissions are not on track to meet [Scotland's emissions reduction targets](#) and measures to reduce the emissions from transport and shift towards more sustainable modes, must be advanced.

3.1 Market Failure

Cycle journeys confer societal benefits in terms of health improvement, congestion reduction, climate change and air quality improvement, among others ([Davis, 2014](#)). However, cycle journeys are not currently being supplied at a rate which optimises these benefits to society. This failure to capture the potential for journeys to be made by bicycle can be described as a net welfare loss to society. Government intervention can therefore be justified on the basis that the market has failed to deliver the best outcome and that intervention may be able to unlock benefits that would otherwise remain hidden. When it comes to the allocation of road space for safe cycling infrastructure, there is no meeting of supply and demand through a price mechanism, because roads are publicly funded through general taxation. Therefore, there is a missing market for road space and in order to allocate this common resource efficiently for the maximum public benefit, government intervention is justified.

3.2 Supply and Demand

The Cycling Action Plan for Scotland (CAPS) set a vision of 10% of journeys to be made by bicycle by the year 2020. The [Scottish Government](#) invested nearly £300 million in active travel between 2010 and 2019 and £80 million per year in 2018-19 alone. This budget is shared across 32 local authorities in Scotland and is broadly split into a capital grant, allocated for construction of traffic free cycle facilities and a revenue fund, aimed at changing individual behaviour by encouraging 'smarter choices'.

It is acknowledged 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. Capital and revenue programmes broadly fall either side of supply or demand side of economic theory. Funding for cycle infrastructure seeks to increase the supply of safe cycle infrastructure, thereby increasing the number of journeys taken, while smarter choices measures are intended to increase demand for cycle journeys, by promoting active travel and thereby increasing individual's willingness to choose a cycle journey over the alternative.

Despite the levels of investment to date, the share of journeys undertaken by bicycle is currently around 1.2% ([Cycling Scotland, 2021](#)). More, therefore needs to be done to shift the balance of demand for cycle journeys and supply of safe cycle routes, in order to achieve a fundamental shift large enough to support the target set by the Climate Change Plan to reduce car kilometres by 20% by 2030.

4. Assessment Summary

This section summarises the results of the assessment exercise which are presented in full in Appendix A. Below is a summary of the assessment exercise, drawing out the potential impacts (positive and negative) from the actions within the delivery plan.

4.1 Businesses

Overall, actions within the 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. Building on the network of long-distance routes which connect to the national cycle network (NCN), and promoting cycling through communication campaigns, will have a positive impact on businesses operating in the tourism sector, while integration with events such as the cycling world championships will further encourage inward investment and opportunities for economic activity. Actions aimed at enabling greater use of cargo-bike deliveries could help to remove barriers to market entry for smaller scale last-mile logistics companies, which could help to grow the sector in a sustainable way. In addition, support for the bicycle industry could help to grow this sector in Scotland.

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. Some uncertainty remains around the potential impacts of changes to Traffic Regulation Orders (TROs) as it is not clear at this stage whether the proposed changes will retain and enhance statutory minimum levels of consultation and engagement. Similarly, if fast-track procurement of land outwith existing legal processes does not include sufficient facility for consultation and engagement with local land owners and businesses, this proposed action could have potentially significant negative impacts. The travel demand management measures set out in the national route map for car km reduction may also have significant impacts on business, depending on how it is delivered, and the role of the cycling framework in supporting this is not clear. More information is therefore needed in order to understand the potential impacts of this large shift in travel behaviour.

Potentially negative impacts on smaller private bus operators are possible if additional requirements are placed upon them. Private bus operators in rural and island communities may or may not have the means to retrofit buses with the required facilities to carry bicycles and so this requires further consideration.

4.2 Local Authorities

As statutory roads authorities, Local Authorities are fundamental to the successful delivery of cycle infrastructure and are also key partners in behaviour change activities. Long-term funding arrangements, the removal of barriers to funding and the provision of appropriate resource will provide Local Authorities the capacity needed to fulfil these aspirations.

4.3 Consumers

Consumers could potentially benefit from actions aimed at increasing access to bikes if these measures enable choice and support the retail sector. Schemes delivered through commercial retailers, such as the cycle to work scheme, have been shown to be of economic value to participants and the industry.

4.4 Organisations in the third sector

The Cycling Framework lists third sector organisations as lead delivery partners under several actions. Though the impacts of the Cycling Framework on the third sector are difficult to quantify, the capacity for third sector partners to deliver these actions must be considered carefully and resourced proportionately.

Appendix A : Cycling Framework BRIA Assessment Tables

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
Safe Cycling Infrastructure	Work with local authorities on creating active travel strategies to prioritise investment in the creation of a dense, coherent network of connected cycling infrastructure in every town and city that is segregated from traffic and integrated with public transport	Minor Positive	<p>Business: Evidence shows that active travel can positively influence retail footfall at a local level. If active travel networks are planned with local economic interests in mind and with the support of local businesses, there are positive benefits to retailers:</p> <ul style="list-style-type: none"> • https://www.sustrans.org.uk/media/5224/common-misconceptions-of-active-travel-investment.pdf • https://www.livingstreets.org.uk/media/3890/pedestrian-pound-2018.pdf • https://www.tandfonline.com/doi/abs/10.1080/01944363.2019.1638816 ; • https://publications.iass-potsdam.de/rest/items/item_6000977_2/component/file_6000978/content ; • https://www.tcat.ca/wp-content/uploads/2016/12/Bike-Lanes-On-Street-Parking-and-Business -A-Study-of-Queen-Street-West-in-Toronto%E2%80%99s-Parkdale-Neighbourhood.pdf <p>The impact of this on businesses within the tourist industry could be broadly positive if it results in increased cycle tourism on the NCN and this links tourists to local towns and villages:</p> <ul style="list-style-type: none"> • https://www.cycling.scot/mediaLibrary/other/english/2548.pdf • https://transform.scot/wp/wp-content/uploads/2018/06/Routes-to-Growth-Transform-Scotland-report-version-2018-06-22.pdf <p>Local Authorities: Local authorities are key partners in delivering the action and will require local authority resource to deliver the action.</p>
	Remove barriers to the fast implementation of cycling infrastructure, including through	Minor Negative	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

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	changes to the TRO process, and support the use of temporary and trial schemes		<p>small businesses may be more vulnerable to any potential adverse effects. At present the TRO process mandates statutory minimum levels of consultation and objections must be addressed. Any changes to the process that erode this requirement could negatively impact on specific businesses unless other effective means of input into the process are in place.</p> <p>Recommend wording be added to the action to ensure opportunities for consultation are retained: Remove barriers to the fast implementation of cycling infrastructure, including through changes to the TRO process, and support the use of temporary and trial schemes, whilst retaining adequate opportunities for consultation, in-line with Scottish Government Guidance.</p> <ul style="list-style-type: none"> https://www.gov.scot/publications/consultations-in-the-scottish-government-guidance/ <p>ETRO can remain in place for six months while objections are addressed and, while in practice it is likely every effort will be made to mitigate any potential impacts on businesses, there remains the possibility that negative impacts could take effect within the six month trial period.</p> <p>The Road Traffic Regulation Act 1984 has recently been amended by the Traffic Regulation Orders (Procedure) (Miscellaneous Amendments) (Scotland) Regulations 2021:</p> <ul style="list-style-type: none"> https://www.legislation.gov.uk/ssi/2021/348/pdfs/ssipn_20210348_en.pdf. <p>The amendment removes the requirement for publication of a proposed ETRO and allows for objections to be made whilst the ETRO is in place, where an order is made to give permanent effect to an ETRO. A new procedure has been introduced to make an ETRO permanent, without a further objection and consultation period.</p>
	Make it safer to walk, cycle and wheel across and along the trunk road network, both where it passes through towns and villages and where it links two or more settlements	Uncertain	The action has an uncertain relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Use the Scottish Government's compulsory purchase reform	Minor Negative	Section 22 of the Land Reform (Scotland) Act 2003 contains provision for a core path to be enforced via means of a path order

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	programme to consider whether powers to acquire land for the purposes of cycling infrastructure are fit for purpose		<ul style="list-style-type: none"> https://www.gov.scot/publications/part-1-land-reform-scotland-act-2003-guidance-local-authorities-national-park-authorities/documents/). <p>Reallocation of land for cycling infrastructure within the limits of the adopted road network is within the powers of local authorities via the TRO process.</p> <p>The Acquisition of Land (Authorisation Procedure) (Scotland) Act 1947 provides for the compulsory purchase of land by a public body (Acquiring Authority), if confirmed by Scottish Ministers. The Land Reform (Scotland) Act 2003 also extends the powers of an Acquiring Authority to some non-public bodies. These powers extended to any development, including land for cycling infrastructure. However, this is a costly and lengthy process.</p> <p>Procurement of land outwith the above legal processes would be subject to negotiation with individual private land owners. Fast-track powers which do not include a sufficient element of consultation and engagement with local land owners, and businesses could have potentially significant negative impacts. Engagement with the compulsory purchase reform Programme must therefore follow Scottish Government Guidance on consultation.</p>
	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	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Develop a national approach to the creation of quiet road/cycle friendly roads in rural areas with everyday journeys prioritised	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Update design and asset management guidance to enable	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	national, consistent principles of infrastructure		
	Engage the business sector to embed active travel in wider corporate culture including through the use of cargo cycles as the normal choice for local deliveries	Minor Positive	<p>Pilot projects have shown that, where the right operating conditions exist, cargo-bike delivery start-ups can flourish in the already highly competitive sector of first mile/last mile deliveries:</p> <ul style="list-style-type: none"> • https://sestran.gov.uk/news/e-cargo-bikes-to-explore-transforming-logistics-in-edinburgh/ <p>Both potentially positive and negative effects therefore exist for businesses operating in the first mile/last mile freight delivery sector. Incumbent operators which do not switch to some deliveries by cargo-bike may lose market share to those that do. However, overall, this measure will help to introduce healthy competition to this sector.</p>
	Support communities to close roads to allow for community events such as Play Streets and Car Free Days and to transition successful schemes to more permanent arrangements	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Support the various deliverables set out in Scotland's Road Safety Framework 2030 under its Active and Sustainable Travel Strategic Action, ensuring that road safety remains a key focus of active and sustainable travel in Scotland	Minor Positive	<p>Road collisions cost the Scottish economy around £1 billion per year.</p> <ul style="list-style-type: none"> • https://www.transport.gov.scot/media/49193/scotlands-road-safety-framework-to-2030.pdf <p>Some of these costs are in lost output and direct damage to property, both of which significantly impact on business. Road safety improvements therefore are likely to have an overwhelmingly positive impact on businesses.</p>
Effective Resourcing	Review options for multi-year, long-term funding for infrastructure and behaviour change programmes where appropriate	Minor Positive	Local authorities are key partners in delivering the aspirations within NTS2. Long-term funding arrangements, supported by appropriate resource will provide Local Authorities the capacity needed to fulfil these aspirations.

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	Increase active travel budget to £320 million or 10% of the transport budget, whichever is greater, by 2024-25	Minor Positive	The active travel budget is committed within the 'Bute House Agreement' The Cycling Framework and Delivery Plan for Active Travel in Scotland 2022-2030 is a means by which this investment will be delivered. The impacts of the investment will therefore be in line with the overall assessment of the actions within this document.
	Ensure the appropriate level of resource is in place to develop and deliver active travel strategies ensuring that cycling for transport is prioritised appropriately	Minor Positive	Local authorities are key partners in delivering the aspirations within NTS2. Long-term funding arrangements, supported by appropriate resource will provide Local Authorities the capacity needed to fulfil these aspirations.
	Work with manufacturers, social enterprises and industry vocational partners to increase cycle and cycle parts production and recycling in Scotland with a focus on green skills and materials research and development	Minor Positive	<p>Though the estimated value of bicycle and parts manufacture in Scotland is estimated to be low (around £2m per year), this action has the potential to help grow the industry in a sustainable way.</p> <ul style="list-style-type: none"> • https://www.cycling.scot/mediaLibrary/other/english/2548.pdf <p>Impacts on bicycle refurbishment and fabrication businesses will be positive. Although this action needs to be explored further, though engagement with the sector, in order to fully understand it's reach.</p>
Fair Access	Expand access to cycles, including adaptive cycles, e-cycles and cycle share	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Review funding criteria to ensure that fair access is appropriately weighted and improving accessibility is given an appropriate level of priority	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Improve quality and level of service of carriage of bikes on trains and require rural & island bus services to carry cycles,	Minor Negative	Potentially negative impact on smaller private bus operators if additional requirements are placed upon them. Private bus operators in rural and island communities may or may not have the means to retrofit buses with the required facilities to carry bicycles. Arrangements for bicycle carriage could, however, be considered as part of Bus Service Improvement Plans (BSIPs) https://www.transport.gov.scot/public-transport/buses/bus-partnership-fund/criteria/

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	where appropriate		Any funding available must be straightforward to access any requirement to carry cycles must be developed in collaboration with operators.
	Support cycling journeys to and from public transport hubs as part of a multi-modal journey	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Provide a free bike to all children of school age who cannot afford one	Minor Positive	Potentially positive effect on bicycle industry and retailers, if such bicycles are made available through retailers, rather than as bulk purchases made directly by the government. Schemes delivered through commercial retailers, such as the cycle to work scheme, have been shown to be of economic value to participants and the industry https://www.employment-studies.co.uk/system/files/resources/files/509.pdf
Training and Education	Provide a comprehensive cycle training offer for all life stages, including learning to ride in pre-school, learning to ride on-road through school bikeability training, and for adults of all ages, including cycle awareness training	Uncertain	Uncertain effect depending on how the training will be delivered and by which organisations. Local authorities and third sector partners are likely to be key service providers in delivering the action and will require sufficient resource to deliver the action. Note that resourcing is covered in action ER.2.
	Use the Cycling World Championships to inspire people, especially young people to cycle	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Promote the new Highway Code and implement requirements for cycle training	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Provide local authorities with resources, including guidance and best practice examples, to enable	Minor Positive	Local authorities are key partners in delivering the aspirations within NTS2. Long-term funding arrangements, supported by appropriate resource will provide Local Authorities the capacity needed to fulfil these aspirations.

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	effective local community engagement		
	Develop a long-term communication plan that represents cycling as something that anyone can do, including with assistance/adaption and is a transport mode that brings many benefits to Scotland	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
Network Planning	<p>Produce active travel strategies for each local authority area, setting out plans to improve active travel networks and facilities to 2030</p> <p>Strategies should be in line with regional transport strategies, include detailed mapping and use an evidence-led approach to network planning</p>	Minor Positive	<p>Business: Evidence shows that active travel can positively influence retail footfall at a local level. If active travel networks are planned with local economic interests in mind and with the support of local businesses, there are positive benefits to retailers:</p> <ul style="list-style-type: none"> • https://www.sustrans.org.uk/media/5224/common-misconceptions-of-active-travel-investment.pdf • https://www.livingstreets.org.uk/media/3890/pedestrian-pound-2018.pdf • https://www.tandfonline.com/doi/abs/10.1080/01944363.2019.1638816 ; • https://publications.iass-potsdam.de/rest/items/item_6000977_2/component/file_6000978/content ; • https://www.tcat.ca/wp-content/uploads/2016/12/Bike-Lanes-On-Street-Parking-and-Business -A-Study-of-Queen-Street-West-in-Toronto%E2%80%99s-Parkdale-Neighbourhood.pdf <p>Local Authorities: Local authorities are key partners in delivering the action and will require local authority resource to deliver the action.</p>
	Produce digital active travel mapping (“a network blueprint”) for	Uncertain	The action has an uncertain relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	Scotland, which is informed by local authority transport strategies		
	Work with other policy areas to introduce localised active travel networks as part of a larger package - eg local development plans - to create efficiencies	Uncertain	The action has an uncertain relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Support the travel demand management measures aligned with the national 20% car km reduction route map	Uncertain	The travel demand management measures set out in the national route map for car km reduction may have significant impacts on business and the role of the cycling framework in supporting this is not clear. Therefore, more information is needed in order to understand the potential impacts of this large shift in travel behaviour.
	Review how active travel/cycling schemes are appraised – broaden the benefits to include social, economic and equality benefits	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
Monitoring	Expand and where possible align monitoring and reporting of cycling levels at local, city, regional and national level and share learning	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Continuously monitor and evaluate the impact of active travel investment and embed learning in future investment decisions	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.
	Conduct research on the social, environmental and economic	Neutral	The action is expected to have a broadly neutral relationship to business and regulation / the relationship is dependent on the way in which the aspect is managed.

Strategic Theme	Action	How is the Action likely to impact on Business, Local Authorities, Regulators or Third Sector partners?	Comments and evidence relating to these groups with regards to the action
	factors influencing network planning, for example pandemic recovery and climate change impacts		

Appendix B : Consultation Responses and Actions

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.

Name/ Organisation	Comment/Feedback	Actions
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.

Name/ Organisation	Comment/Feedback	Actions
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.

Name/ Organisation	Comment/Feedback	Actions
Jon Jewitt	<p>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.</p>	<p>Purpose and rationale for the BRIA is contained in Section 1.3.</p>
Daniel Trotter	<p>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.highstreettaskforce.org.uk/resources/details/?id=07ec60d8-8884-4859-ad49-f2ade6bd8972</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>

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 CI.6, CI.8 & CI.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 C1.6 and C1.8) 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_age_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>

