

# EAST LOTHIAN COUNCIL LOCAL TRANSPORT STRATEGY

Consultation response from Transform Scotland

Thursday 10 May 2018

## 1. Introductory comments.

We welcome East Lothian Council's preparation of a revised Local Transport Strategy (LTS). Many Scottish Local Authorities are, in our view, negligent in their failure to maintain updated transport strategies, and, as such, ELC deserves praise in initiating its process to develop a revised LTS.

We find the draft objectives to be in line with the existing Scottish Government National Transport Strategy and on wider goals on public health and climate change. The strategy is thorough in identifying five themes, meeting the challenges with seven objectives and addressing them within the four Action Plans. However, while we welcome the detail into which ELC has gone, we find the documents to be overly long, and would raise the concern that this will limit the number of people who will be prepared to read them let alone provide their opinion. As a minimum, it would be useful to have executive summaries for the four Action Plans.

We welcome the progress made since the LTS 2001 and commend the new draft strategy's objectives:

- *To deliver a more attractive and safer environment for pedestrians and cyclists;*
- *To reduce the overall dependence on the car and the environmental impact of traffic;*
- *To promote the availability and use of more sustainable means of travel;*
- *To locate new development where it reduces the need to travel;*
- *To maximise accessibility for all and reduce social exclusion;*
- *To promote integration and interchange between different means of travel; and*
- *To maintain the transport network to a suitable standard to ensure it meets the needs of all users.*

It is also to be commended that active travel is listed as the top objective, and forms the focus for the first of the four Action Plans. Our response focuses on the Active Travel Improvement Plan (ATIP) and, in particular, its section on Indicators and Target. While we consider that there is much to be praised, we would note that the introduction states the rural nature of East Lothian creates car dependency; however, the overwhelming volume of all journeys are short in distance, and the majority of the East Lothian population live in towns where short journeys lend themselves to active travel.<sup>1</sup>

## 2. Comments on Action Plans

### Active Travel improvement Plan (ATIP)

There is a lot in the Plan. However we would recommend a greater focus on developing Cycle Friendly Town Plans, including provision of secure cycle storage in locations where residents are limited by lack of space within their own properties. Timescales, even when given as short, can be up to five years. There is little mention how the ATIP will be implemented given the limits of staff time and resources available. It is imperative that adequate revenue funding be provided to ensure maintenance of the network.

## East Lothian Segregated Active Travel Corridor

We welcome the acceptance of the need for a high quality segregated facility to deliver a major boost to the uptake of active travel. However, we consider that there may be an over-emphasis on the provision of long distance cycling to the detriment of shorter trips. Our view is that a more immediate focus should be on developing cycle-friendly networks within the towns of East Lothian. The plan acknowledges that the corridor is a long-term (possibly up to 20 years) project.

The compact nature of the towns lends itself to developing networks for cycling and walking that will promote a modal shift from private cars. Evidence for this is given by the following statement in the LTS:

*However, where possible residents clearly like to make use of local services and amenities when these are available with high levels of bicycle access and walking both pointing towards large numbers of short journeys.*

We look forward to the development of the Cycling Strategy as part of the LTS - 4.4.

**Park and Ride** - For many short journeys to rail stations, active travel should be encouraged, providing covered and, where appropriate, the option of secure bike parking. There is also scope for providing bike parking at rural bus stops to facilitate park and ride.

**Buses** - In general there is limited reference to buses. The dramatic increase in bus patronage (30% over the past year) merits further investment in infrastructure for the bus waiting environment. Moreover, as well as improvements in smart information, we propose that ELC takes responsibility for providing up-to-date information at bus stops where there is currently a shortfall. There is work that can be done to serve newly developed areas of housing, encouraging more local bus use. In partnership with other Local Authorities, a more equitable fare structure should be promoted.

The ATIP states:

*East Lothian Council will lead by example on this and ensure that staff throughout the Council are supported and encouraged to travel actively to and from work, and during work hours.*

However there is no mention of an associated plan.

## Parking Management Strategy

We commend the proposal to charge for on-street parking in East Lothian towns in order to encourage modal shift. The needs for residents' parking will need to be dealt with sensitively, with the introduction of residents' permits. However, we presume the lack of commensurate treatment for out-of-town sites (e.g. retail) is due to the absence in Scottish policy of the powers for Local Authorities to implement Private Non-Residential Parking Levies; as such, we recommend that ELC presses the Scottish Ministers to include enabling powers in its forthcoming Transport Bill.

## Road Asset Management Plan

Priority should be made to ensure the cycling and walking network is of the highest quality to encourage Active Travel. This includes the necessary infrastructure at and around bus stops.

## Road Safety Plan

Given that numbers of pupils undertaking Bikeability level 2 have decreased significantly, there is a need to increase resources allocated to cycle training.

## Indicators and Targets

The absence of adequate targets for Active Travel projects – and the subsequent lack of monitoring of progress – remains a weakness. The only target specifically for cycling in itself fails to show if cycle use has increased, rather than cycle ownership:

*Increase households owning a bicycle to 55% by 2024*

The other target that includes cycling is:

*Modal share for travel to work. Reduce levels of car use and increase use of sustainable modes including walking, cycling and public transport by 2024.*

However, as previously acknowledged, many people travel outwith the county for work and there may be limited opportunities for modal shift. Working to reduce other car journeys may be more productive. Promoting walking and cycling with public transport could be part of an effective strategy. We would recommend the addition of cycle parking in target 8 (Park and Ride provision), and therefore again in future Key Transport Statistics (1.6). The only other mention of increasing use of public transport is reducing expenditure on Supported Bus Services (target 10).

In addition to a lack of targets, we would question how progress towards meeting those targets for walking, cycling and public transport will be monitored in order to assess if the LTS's Action Plans are making progress.

The need for an audit of the current state of East Lothian is an important element of a successful strategy and was indeed proposed in the previous LTS (2001).

The Council itself is the largest employer in the county and therefore its own Green Travel Plan plays a key role in achieving the above objectives (see ATIP). It is essential that, unlike the 2010 plan, the updated plan is implemented. Whilst the LTS states it will explore Personalised Travel Planning (PTPs), evidence already suggests it is an effective means of reducing car use.<sup>2</sup>

One final comment concerns e-mobility. There is a mention of e-bikes in the ATIP but no further mention about further development of e-mobility. As technology advances, plans should incorporate consideration of e-mobility (including the development of a network of charging points for both vehicles and bikes).

### 3. Overall Assessment.

There is good intention in the LTS, with the problems and challenges comprehensively described. Meeting the objectives depends on focussed projects with sufficient targeted funds and staff time as well as supportive allocation of resources by the Scottish Government.

As stated in Transform Scotland's previous analysis of LTSs (2001):

*"It is essential that available funds be directed to investments that can meet policy aims and which are value for money - and not thrown away on prestige projects, which can be counterproductive. "*

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<sup>1</sup> 48% of all journeys are <3km and 77% <10km, Transport and Travel in Scotland 2015, Transport Scotland.

<sup>2</sup> <https://www.sustrans.org.uk/our-services/what-we-do/engaging-communities/personalised-travel-planning>

**Scotland's alliance for  
sustainable transport**

Transform Scotland  
5 Rose Street, Edinburgh, EH2 2PR  
t: 0131 243 2690  
e: <info@transformscotland.org.uk>  
w: <www.transform.scot>

**transform**  
scotland

We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).