

MRC/CSO Social and Public Health Sciences Unit Consultation Response

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| **Title of consultation** |
| Cycling framework for active travel |
| **Name of the consulting body** |
| Scottish Government |
| **Link to consultation** |
| <https://consult.gov.scot/transport-scotland/cycling-framework/> |
| **Why did the MRC/CSO Social and Public Health Sciences Unit contribute to this consultation?** |
| At the MRC/CSO Social and Public Health Sciences Unit we develop and use cutting-edge methods to understand how social, behavioural, economic, political and environmental factors influence health. We work with decision makers, practitioners and the public to identify ways of achieving sustained improvement in health and wellbeing, particularly among those most in need. |
| **Our consultation response** |
| **Framework and Delivery Plan Purpose**1. Do you agree with the above statement of strategic priorities for driving the development of cycling for transport in Scotland?

Yes* 1. In principle, we agree with the statement of strategic priorities for driving the development of cycling for transport in Scotland. However, we argue that it is important ensure that these priorities are embedded within broader investment, and a policy commitment to addressing physical inactivity through whole of system approaches (Milton et al. 2021).

**Strategic Policy Links**1. The diagram above sets out how the Cycling Framework is aligned to the wider policy context. Do you agree that this captures the key policy linkages and/or should any policy areas be added or removed?

No* 1. While the diagram sets out broad policy alignment for the Cycling Framework, details available to the respondent are somewhat limited for making an

informed judgement.* 1. The policy links displayed primarily refer to transport-related policies. It will be important to ensure policy alignment across all aspects of government and governance for physical activity) within a wider systems-based approach (e.g. health, education, workplace policies (e.g. providing
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| showers) and sport). Public Health Scotland’s (2022) Framework for Action at a National and Local Level, for physical activity, may be used to consider this wider alignment, as well as resources such as Bellew et al. (2022) and Rigby (2022a).**Delivery Plan - Strategic Themes**1. Six strategic themes have been identified based on stakeholder feedback, as above. These themes illustrate the overarching approach for cycling for transport in Scotland. Do you agree with these strategic themes as priority areas for action in this framework?

Yes* 1. In principle, we agree that the strategic themes set out are appropriate for this framework. Within training and education, however, we propose that there may be a need to intervene to address the ‘us versus them’ culture among motor vehicle users and cyclists (Skinner and Rosen, 2016). There is a lack of driver education and advice about interacting (in broad terms) with cyclists, particularly as part of formal driver training programmes (Bonham and Johnson, 2018). We propose that legislative change that mandates training and increases accountability of vehicle drivers in accident and near-miss situations may be necessary. Similar to recent changes in the Highway Code that give pedestrians right of way when vehicles turn into side streets, further changes to accommodate cycles may increase safety if accompanied by appropriate mass communication campaigns, and appropriate infrastructure.
	2. Inclusive promotional programmes and cycling training will require marketing and delivery in ways that will benefit the communities who would benefit most from these opportunities (e.g. migrant groups whose first language is not English, Gaelic or Scots). Thus, fair access extends beyond enabling access to those with different mobility needs. Proportionate universalism should be considered (Marmot, 2010).
	3. We propose that cycling infrastructure should explicitly include storage of bicycles. Schools- based research indicates that appropriate storage facilities are important indicators of active travel (Ikeda, 2020). However, it will be important to consider these factors more broadly, with secure bicycle racks and e-bike charging points facilitating active travel (Danielis and Scorrano, 2022; Levi, 2022). This may be particularly pertinent to those living in mixed-occupancy residencies and tenement buildings, where storage space may be at a premium.
	4. It is also important to consider integration of cycling and public transport, for example the bicycle carrying capacity of trains and buses (Pucher and Buehler, 2009).

**Delivery Plan - Safe Cycling Infrastructure**1. Do you have any comments on the substance of the delivery plan actions in this section? Safe Cycling Infrastructure Actions:
	1. While we support the increase of segregated active travel infrastructure, as well as initiative such as ‘closed streets’, it is important to ensure the needs of disabled drivers are met, and access to services and places should not be restricted to these groups.
	2. It is important to consider vulnerable road users in broad terms. For example, deaf and blind pedestrians may be disproportionately and adversely affected by increased cycling infrastructure (e.g. they cannot see the bollards or curbs, nor hear the bicycles (Rigby et al., 2022b)).
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| 1. Do you have any comments on the agencies identified to lead and support these actions? Safe Cycling Infrastructure Actions - Lead Agency:
	1. Beyond local authorities and the police, these are primarily transport-related partners. To deliver a politically aligned and integrated Cycling Framework, it will be necessary to engage broader sectors as primary delivery partners (Bellew et al., 2022; Milton et al., 2021; Rigby et al., 2022ab).

**Delivery Plan - Effective Resourcing**1. Do you have any comments on the substance of the delivery plan actions in this section? Effective Resourcing Actions:
	1. Active travel budgets should be used flexibly, and be appropriately resourced, to address significant inequalities in cycling spending by local authorities (Cycling UK, 2021).
2. Do you have any comments on the agencies identified to lead and support these actions? Lead Actions:
	1. Please see response 5.1 under question 5.

**Delivery Plan - Fair Access**1. Do you have any comments on the substance of the delivery plan actions in this section? Fair Access Actions:
	1. Please see response 3.4 to question 3.
	2. There are additional costs associated with cycling that extend beyond bicycle ownership. For example, depreciation, insurance, maintenance and vital accessories may cost around £400 per annum, based on 2,500 miles cycled (CycleScheme, 2017). Further, there is the additional cost of public transport when combined with active travel; the average commute in Scotland in 2019 cost

£700 per annum (Bank of Scotland, 2019). Thus, we propose that it will be important to strengthen and extend the focus on equity, such that it is more holistic. See also responses 3.3 and 3.4 to question 3 about access to storage, and consider the impact of potentially fewer driving licences being held in future and the potential impact this may have of road-awareness and confidence.1. Do you have any comments on the agencies identified to lead and support these actions? Lead agencies:
	1. Please see response 5.1 to question 5.
	2. We support the proposal for Sustrans’ continued work, particularly in relation to school- and workplace-based active travel. Evidence indicates that cycling is less prevalent in schools in deprived areas (Panter, 2010; Roth et al., 2012). Sustrans (and partners) may therefore be well positioned to conduct a formal audit of schools active travel provision, with particular focus on the deprivation in catchment areas.

**Delivery Plan - Training and Education**13 Do you have any comments on the substance of the delivery plan actions in this section? |

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| Training and Education Actions:* 1. There is little-to-no evidence that global sporting events lead to changes in physical activity, although awareness of activity may be raised in the immediate timeframe of such events (Bauman et al., 2021; Weed et al., 2021). The importance of global sporting events such as the UCU world cycling championships, is that they enable strategic planning and partnerships across global, national and local bodies, public health agencies and the public to address the complexities of systemic physical inactivity (Bauman et al., 2021; Lion et al., 2022; Milton et al., 2019). However, this requires substantial planning and investment, that if not already initiated for the UCU cycling championships, will be difficult to instigate at this late stage.
	2. We support the idea of a long-term communication plan and draw your attention toward a recent body of work to shape messages around physical activity, including the physical activity messaging framework and checklist (Williamson et al., 2022).
	3. Please see response 3.1 to question 3 about the need for changes to vehicle driver education.
	4. Promotion of the new Highway Code is of particular importance in terms of education. There is little-or-no reference throughout this framework about the upholding of legislation and advisory guidelines pertaining to both motor vehicles and cyclists. All parties should be held accountable for their actions, and in particular, breaking of the Road Traffic Act or Highway Code (e.g. cars passing too close to cyclists; or a cyclist running a red light) needs to be policed thoroughly and consistently.
	5. High-quality cycling training and education is important for raising confidence of cyclists who need to share the road with motor vehicles, but should not be considered as a standalone intervention. Among adults, the evidence is limited and mixed, but on balance suggests training may encourage cycling (Sersli et al., 2019). Among children, uptake of training is more likely in schools where this is free of charge (Goodman et al., 2016) and may lead to increases in cycling to school (Mandic et al., 2019). However, additional interventions that address systemic barriers need to be considered.
	6. Communication of the delivery plan needs to be considered carefully to facilitate implementation at the local level. This needs extensive collaboration, systems leadership and a clearly communicated and enacted strategic vision (Rigby, 2022a). Local implementation may benefit from the development of networks that address the complexity interactions of physical activity stakeholders (Rigby et al., 2021).
1. Do you have any comments on the agencies identified to lead and support these actions? Lead agencies:
	1. We encourage representation from the DVLA, DVSA and other motor vehicle agencies, to advocate for, educate and uphold safe driving standards where cyclists are concerned.

**Delivery Plan - Network Planning**1. Do you have any comments on the substance of the delivery plan actions in this section? Network Planning Actions:
	1. We support the substance of the delivery plan actions in this section. Strategies and plans need to be developed from a whole of system perspective – work underway in Derby, England
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| may be considered here (see research from Leeds Beckett University).1. Do you have any comments on the agencies identified to lead and support these actions? Lead agencies:
	1. Please see response 5.1 to question 5. In particular, if working with other policy areas to devise local networks, these should be listed as primary deliverers and supporting partners in this section of the delivery plan.

**Delivery Plan – Monitoring**1. Do you have any comments on the substance of the delivery plan actions in this section? Monitoring Actions:
	1. We encourage a greater explicit emphasis on the monitoring of inequalities related to cycling. For example, the uptake of cycling in deprived areas. There is no mention here about how equity and equality in cycling prevalence, which are known to differ according to social and demographic strata (Goodman et al., 2018), will be considered.
	2. We encourage a broader emphasis on monitoring and whole of system surveillance (Bellew et al., 2022; Rigby, 2022a).
2. Do you have any comments on the agencies identified to lead and support the actions in this section?

Lead agencies:* 1. Please see response 5.1 to question 5.

**Active Travel Transformation Project**1. For large infrastructure projects, conditions of funding should be delivery on agreed targets for: timescales, expenditure and meeting project objectives.

Disagree* 1. On balance we propose that this statement does not provide sufficient criteria, in particular pertaining to the environmental impact, addressing inequalities, or creating systems change.
1. In order to ensure maximum value for money and impact, active travel funding in the short term should be prioritised for those local authorities with the greatest capacity to deliver, with capacity building support offered to those with the least.

Agree1. Future funding for active travel infrastructure should include a mechanism for re-distributing investment from local authorities unable to deliver to agreed standards and timescales.

Agree* 1. While we agree with this statement in principle, the importance of a whole of systems monitoring and surveillance approach is emphasised here (see response 19.2 to question 19). The complexities of physical activity promotion mean that timescales may necessarily shift, or that

other valuable learning and outcomes may be generated within the predetermined timescales, including where these were not known at the outset. Therefore evaluation of local authority |

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| activity should be executed carefully within a systems framing, and on a case-by-case basis.**Impact Assessments**22 Do you have any comments on the draft Social and Equalities Impact Assessment? Social and Equalities Impact Assessment: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.23 Do you have any comments on the draft Business Regulatory Impact Assessment? Business Regulatory Impact Assessment: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). |
| **When was the response submitted?** |
| 16th December 2022 |
| **Find out more about our research in this area** |
| [https://www.gla.ac.uk/schools/healthwellbeing/research/mrccsosocialandpublichealthsciencesunit](https://www.gla.ac.uk/schools/healthwellbeing/research/mrccsosocialandpublichealthsciencesunit/programmes/)[/programmes/](https://www.gla.ac.uk/schools/healthwellbeing/research/mrccsosocialandpublichealthsciencesunit/programmes/) |
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