

Comments from the West Sussex Cycle Forum on the draft WSCC Active Travel Strategy 2023-2036.

The WSCF welcomes the Active Travel Strategy and very much appreciates the amount of effort that has gone in to it. It is all too easy to be critical. It is hoped that these comments will be seen as helpful and, when incorporated, make the document more pertinent and useful.

Foreword

States that WSCC has delivered 50 kms of new or upgraded active travel infrastructure since 2016. The addition of the word 'upgraded' is a change to what was originally intended and makes things look better than they'd otherwise be. However, a reference to quality rather than quantity is welcome and it is to be hoped that only new infrastructure will be included in the future. This is more fully referred to in our comments on section 8.1.4.

Page 4 – Section 1.

Objective 1 – pathway to net zero. If this refers to net zero within WSCC not the wider community, then it should say so.

Objective 2 – strive to make walking and cycling the natural choice. As we now know, cycling is downgraded whereby the current ATE hierarchy is walking, wheeling, cycling - in that order. ATE's current position of "90% can be achieved by walking" is, possibly, a short term position that is a response to political pressures and funding constraints at this current time. We are hopeful this will be a short term position that will be upgraded in the near future. As such, this is very much unsuitable for a strategy intended to last for thirteen years. If, within a few years, ATE or its successor, finds itself able to re-broaden its horizons, where will that leave WSCC with a walking-focussed strategy? We suggest that WSCC gives itself the opportunity to be clear about what is desirable (and has been the position until 'real politick' intervened) by writing this into the Strategy. That is to say - cycling is the chief game changer and when and if circumstances change, then WSCC will revise this Strategy accordingly.

Page 6 – the measurements – it is worth stating whether these are measured locally (here in West Sussex) or will be taken from national statistics.

90% of ATE's national objectives can be achieved by increasing levels of walking. It is a concern that serious funding for cycling is now downgraded. See above.

Page 11 – 2.3.3- .. invest in new models of mobility...clarity on what this means and what it implies would be useful.

Page 12 Cycling to work. Using census data from 2011 undermines the credibility of the Strategy. 2021 census data should be used.

Page 13 Commuter Cycle flows. Regarding Strava – ordinary people who cycle don't use Strava – so there is little relevance for the people for whom the Strategy is intended. Indeed, it might be misleading and/or counterproductive to include Strava data. There is nothing here that says 'how to get people on bikes' for those who do not cycle currently but would like to if it were perceived as safe and attractive. Specifically regarding cycling to work, we suggest saying – Ensure the development and enforcement of travel plans; and the promotion and support by organisations of the Cycle to Work scheme.

Page 14 Safety and accidents. The word 'accidents' should be replaced by the word 'collisions'. The word collision(s) implies someone or something is at fault and is therefore more accurate.

Page 20. The Multi-Criteria Appraisal Tool. So that it is easily understood by those outside the Council, we suggest that a reference is made to the specific criteria. It is important that people know the bases upon which WSCC will make judgements on ranking of schemes. People might have a view about what is deemed important.

Page 23 section 4.1.6. Although acknowledging that the County Council cannot insist on this for the districts, given that active travel policy and practice change so frequently, we suggest that the update should be on a 3 year cycle rather than 5 year.

Pages 24, 25. Cycle parking. The comfort of secure cycle parking is needed to encourage people to use bikes more than they do. In particular, secure parking for e-bikes is crucial as part of a package of measures to encourage the growing uptake of e-bikes and the potential to bring about meaningful change. They need a different kind of parking/storage.

Page 24 Far too much should and not enough will.

Page 25 – 4.3. Maintenance –the high importance of making routes attractive to ordinary people, who might not currently cycle, is not understood and/or not pursued. Proper maintenance budgets must be baked in at the start of any new infrastructure. It's not good enough for them to rely on 2 vegetation cuts a year. Too often, paths are next to hedges which then just encroach and there's no scraping back done. Why are brambles allowed to be next to paths? The Netherlands have a requirement that hedges etc should at least 2m away from cycle or shared use paths. For example, on the A259 path up to Chichester, in places there's over 1m of width lost to vegetation. Unless paths are attractive & safe to use, then few, other than committed cyclists, will use them. They have to be properly maintained. The ongoing maintenance of pavements is also key, including in villages and beside busy roads. There are instances where walking children to school is very dangerous

due to overhanging vegetation. This has led to people choosing the safer option of driving children to school, rather than walking or cycling.

Page 25 - 4.4.4 The comments on integrating public transport with active travel is welcome. However, no proposed actions or funding are linked with this so clarity is needed as to how this can be achieved.

Page 26 – 4.4.6 e-bikes. This is – in our view – the single biggest oversight in the whole document. To say that e-bikes and normal bikes have the same infrastructure requirements is missing (or avoiding) the point and excuses WSCC from significant rethinking on routes. We say this because e-bikes have the greatest potential for changing people’s views on getting about because they open up a whole new world of possibilities – for example – go further, and with a load with or without a cargo bike. To exploit the potential, whole routes need to be looked at in a different way and infrastructure designed to realise that potential. Design for higher (not high!) speeds, greater volumes, more distinct separation and an elimination of any steps or obstacles (for users of heavy bikes and cargo bikes). Cycle parking for e-bikes needs to be specifically addressed.

Given that WSCC is picking up on ATE’s new statement about 90% of objectives being met by walking, the future for e-bikes in West Sussex looks bleak. And if e-bikes have the greatest potential for change – then the future for real, lasting and meaningful change is also bleak. WSCC is urged to rethink its mindset on e-bikes.

Page 27 – Partnerships. Partnerships with businesses and industries are important but the most critical is partnering with schools. This is because while there is a practical day to day benefit, more significantly, there is also huge educational benefit whereby children will learn the cycling habit. The work now being done on school streets is good and should be expanded and enhanced. It is sufficiently important to warrant (re)establishing the Travel to School function. Para 5.2.5 (page 28) is far too weak and is unrealistic. Schools have enough to do delivering the curriculum. They could be partners, but realistically, schools need the energy to come from WSCC. Targets must be set for a roll-out of school streets to relevant schools.

Page 31 7.2.5 Reference must be made to the fact of Level 0 at the start of the Strategy along with the firm intention to do what is necessary to progress through the levels and to set a timeline for each newly achieved level.

Page 32. 7.2.8. Tourism operators are mentioned as a group to discuss plans with. But - Cycle Tourism is barely touched on in the document and yet could play a major role in the promotion and development of cycling. Our local environment, climate and landscape sets West Sussex as an outstanding location for cycling in the UK. WSCC would do well to

benchmark with other LAs to see what their strategies involve. For example – Derbyshire CC: they recognise the benefits of cycle tourism which is forecast to grow at a rate of 10-15% pa. They hold webinars for local businesses on various cycling related topics in order to enhance economic activity. See <https://www.derbyshire.gov.uk/council/news-events/news-updates/news/pedal-power-boost-for-tourism-businesses.aspx>. More cycle tourism would inevitably be to the benefit of WSCC's strategy goals. It's not good enough to say this is SDNPA's special strategy area, it should be a key part of WSCC's strategy.

Page 33. 8.1.4. The reference to new cycling infrastructure (rather than new cyclable infrastructure e.g. upgraded PRoW) is at odds with the comments in the Foreword. We suggest that the lack of overall coherence, consistency and clarity that this creates is rectified and that the Foreword is rectified by rewording the Foreword to point to new cycling infrastructure only. For 8.1.4 specifically – if WSCC is to capture usage (difficult) rather than distance (easier) – then it should say it will do this not 'work towards'. Will implies achieving it as an objective, whereas 'work towards' implies that that alone is the objective. A usage target is an admirable objective; but undeliverable if WSCC believes it is not at a point where it is practicable. This caveat completely undermines this whole paragraph. Our suggestion is that it is toughened up so that there is a written pathway to a usage target that works as intended.

Omission – where is the NCN2 plan? Where is the strategy to get people on bikes? Where is mention of measures to prevent close passing?

Omission - there is nothing in the strategy or the LCWIP which supports rural areas or smaller towns. As LCWIPs are now seen as crucial to gaining ATE funding we request that the strategy must have a way of helping areas with no LCWIP to develop their own plans should they wish.

Omission - 20mph zones, especially area-wide schemes: although it is acknowledged that the current government is making this a politically contentious issue, the Strategy must highlight the benefits to active travel of lower speed limits and allow room in the Strategy for bolder action on this when political attitudes change.

Omission - Although planning is the domain of the Ds and Bs, the Strategy must recommend that new build housing developments should be 20mph zones and have a 20mph design speed.

Overall – the WSCF would like to see focus on five main areas – new (predominantly cycling) infrastructure, schools, infrastructure maintenance, cycle parking and e-bikes.

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