



*Cardiff Cycling Campaign is a voluntary membership organisation for Cardiff, established in 1988 and having elected officers and other volunteers. The Campaign is an active member of 'Cyclenation', the UK federation of cycling campaigns and bicycle user groups having an aggregate membership of 20,000 members.*

## **Response to the Business & Enterprise Committee consultation on Active Travel (Wales) Bill from CTC Cymru**

### Consultation questions

1. Is there a need for a Bill aimed at enabling more people to walk and cycle and generally travel by non-motorised transport? Please explain your answer.

Cardiff Cycling Campaign sees the Bill's provisions as a potentially useful development of transport provision for cycling and walking in Wales. The reason this duty is needed is that, although reference is made in highway authorities' Local Transport Plans and those of Regional Transport Consortia to cycling and walking provision, this has not resulted in consistent support for cycle and walking route planning infrastructure within transport plans. The objectives of the Welsh Walking and Cycling Action Plan, for networks of planned routes to be designed to accommodate [a substantial increase in levels of] cycling and walking, have not been adequately incorporated in such plans.

The proposals in the Bill may be helpful in placing upon local authorities to identify, map and plan routes and improvements, together with the requirement on the Welsh Government to include such routes in relation to the national highway network.

Having said that, routes that are planned must be subject to strict criteria for clarity, directness, convenience, comfort and safety, with regard to land use strategies and the need to link with existing and future public transport interchanges. They must become an "active travel" component of transport planning rather than continue as primarily leisure routes. A stronger duty is

required both on local authorities and the Welsh Government itself to overcome the severance caused by all major roads and junctions – the key barriers to cycling (and walking) in both urban and rural areas.

2. What are your views on the key provisions in the Bill, namely –

the requirement on local authorities to prepare and publish maps identifying current and potential future routes for the use of pedestrians and cyclists (known as “existing routes maps” and “integrated network maps”) (sections 3 to 5);

Cardiff Cycling Campaign regards the mapping requirement as a dynamic planning tool for cycling, (and walking) route development, with this process recognising existing routes that can be incorporated into a developed route network and the need for application of consistent criteria for route design and use.

the requirement on local authorities to have regard to integrated network maps in the local transport planning process (section 6);

Cardiff Cycling Campaign believes this requirement is essential for the integration of cycling and walking in the local transport planning process. This will require demonstrable evaluation / appraisal of cycling and walking modes with regard to transport objectives and assessments. These will then be subject to public accountability and the consideration and delivery of transport funding. Potentially, it will also produce evidence of land use requirements of such route networks within strategic / local development plans that can be taken into account in the planning system.

the requirement on local authorities to continuously improve routes and facilities for pedestrians and cyclists (section 7);

Cardiff Cycling Campaign supports this requirement and recognises the requirement is subject to ongoing guidance from the Welsh Government, which, subject to the timetables proposed in the Explanatory Memorandum, will monitor and take into account progress at each highway authority level as well as evidence of increasing cycling and walking as a result of route developments and associated support. We would like to see reference to Local Transport Plans (and local cycling strategies where these are adopted) in terms of changes in transport modal share in favour of cycling and walking, at authority level and at defined population centre levels.

the requirement on highway authorities to consider the needs of pedestrians and cyclists when creating and improving new roads (section 8)

Cardiff Cycling Campaign regards this statement – “consider the potential for enhancing walking and cycling provision in the development of new road schemes” - as an extremely weak statement. New road schemes should

always include provision for enhanced walking and cycling; a duty to “consider the potential” is hardly an arduous duty to discharge. As the Explanatory Memorandum itself points out, retrofitting of cycling infrastructure in road improvements will be more expensive and more difficult.

Improving the existing national networks to make them fit for cycling is also extremely important – in many cases busy roads act as a major barrier for cyclists and pedestrians, yet local authorities seldom have the resources available to overcome these barriers. The weakness of this statement suggests that the Welsh Government is telling the local authorities of Wales to: “do as we say, not as we do.”

Substantial new road schemes are subject to WelTAG assessment and it is important that such assessment incorporates consideration of options for enhancement of walking and cycling routes, interchange between modes and, by revision of WelTAG, preference in assessment terms for non-motorised transport modes over road schemes. Such assessment needs to incorporate Manual for Streets guidance and to be fully adopted by the Welsh Government, regional transport consortia, and the local highway authorities.

A stronger duty is required both on local authorities and the Welsh Government itself to overcome the severance caused by all major roads and junctions – the key barriers to cycling (and walking) in both urban and rural areas.

3. Have the provisions of the Bill taken account of any response you made to the Welsh Government’s consultation on its White Paper? Please explain your answer.

Funding of route development and improvement

We believe that, understandably, the Bill considers primarily the financial provisions for mapping current and prospective routes. However, the implications for route funding at local authority, regional, and national levels need to be recognised within the Bill’s provisions, by explicit duties to fund such developments through an integrated funding regime.

The enhancement of a route network needs to be included in transport and land use development plans, including regional transport strategies and Local Development Plans. For this reason, it is necessary to integrate walking and cycling route development and enhancement in transport assessment, prioritisation, and funding, and in planning processes, in order to deliver Active Travel objectives.

Rights of Way

In our White Paper response, we considered the mapping requirement in relation to rights of way, including Cycle Tracks, and the potential role of Local Access Forums to assist in identifying paths for priority maintenance and improvements.

We agree that the Bill has and should have the active travel objective in relation to population centres. Having said that, there is an opportunity to align rights of way with mapping of cycling and walking routes, recognising that these will provide some elements of route networks to be mapped as integrated networks, even within urban areas.

Discussions on the Active Travel (Wales) Bill within the Local Access Forums and the National Access Forum have produced proposals for the incorporation of the Rights of Way designation into the proposed route networks. This is positive in terms of the level of expertise in development, implementation, and protection, of rights of way that can be brought to these proposals. In particular, the status of "Cycle Tracks" could be used to strengthen the designation of cycle routes and contribute to the comprehensiveness of route networks, perhaps also leading to enhanced mapping and promotion (including in electronic mapping and open source journey planning data) of such designated routes.

4. To what extent are the key provisions the most appropriate way of delivering the aim of the Bill?

Having regard to the potential for highway authorities to contract out the mapping of integrated route networks, and for experience at local authority level not to be shared, Cardiff Cycling Campaign believes that the duty is best enforced through two mechanisms:

- The establishment of a national support team with the expertise to assist local authorities in the drawing up of their plans, their associated maps and the implementation of proposed schemes. Such a support team could also publish analysis on the progress of local authorities, thereby placing pressure on under-performing local authorities.
- The provision of dedicated funding to support its objectives, and its withdrawal if local authorities fail to achieve progress, and measures to co-ordinate progress by action at Regional Consortia level.

5. What are the potential barriers to the implementation of the key provisions and does the Bill take account of them?

Cardiff Cycling Campaign believes that there is a danger that the route requirements will be interpreted as "an extension of the 'National Cycle Network' into urban and suburban areas." They are not, and over-emphasis on separation of routes from the highway network will have a detriment on the need for clarity, directness, convenience, comfort and safety.

The majority of streets can be made suitable for cycling and should have the potential, with reduction of traffic speed and volume, to be included in cycle route networks. But, highway authorities have shown that they have an incomplete awareness of Manual for Streets guidance. Nor do they have, except in specific instances, sufficient experience and understanding of the treatment of 'streetscape' - the public realm – incorporating cycling- and walking-friendly infrastructure in urban development.

One approach would be to turn the guidance on design for cycling into a wider, all encompassing manual for increasing cycle use, similar to the recently reproduced Danish Collection of Cycle Concepts, which explains the role of good infrastructure alongside the need to promote and support. (<http://www.cycling-embassy.dk/2012/05/10/cycle-concepts2012/>).

6. What are your views on the financial implications of the Bill (this could be for your organisation, or more generally)? In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Impact Assessment), which estimates the costs and benefits of implementation of the Bill.

The Explanatory Memorandum concentrates initially on the costs to local authorities of mapping current walking and cycling provision for a number of population thresholds. This mapping process is just starting point for many highway authorities, though it recognises the existing planning work conducted in, for example, Cardiff and Swansea. Noting that this has developed out of traffic and casualty data, transport and demographic modeling, and stakeholder consultations, it is apparent that the development of integrated network maps, and ensuing and continuous improvements, will be substantial.

Rightly, the economic benefits of cycling and, to a lesser degree walking, are assessed. To what extent will these be recognised in funding commitments for improvements in cycling and walking routes? Cardiff Cycling Campaign is strongly of the opinion that a robust funding method needs to be developed and used to support these improvements, related to Local Transport Plan appraisal arrangements. As an example from the Cycling England demonstration towns, and the Transport for London plans, we believe that dedicated funding of cycling should be of the order of £10 per head per year, and can be justified by the economic benefits of such investment. It will need reallocation of Government funding of transport schemes to provide for this.

As volunteer advocates of cyclists' rights we welcome requirements on each transport authority to develop cycling routes that will achieve measurable and accountable improvements. As advocates and cycle users we expect to be consulted at all stages of local / county route development and of strategic development across Wales. This will place greater responsibility on our rights representatives and a greater burden on the resources of our organisation.

There will be costs in the form of volunteer time involved in contributing the mapping at the Cardiff level.

7. To what extent has the correct balance been achieved between the level of detail provided on the face of the Bill and that which will be contained in guidance given by the Welsh Ministers?

We think that mapping should not be prescriptive and that the type of routes and facilities to be mapped should be addressed in guidance. The legislation should, however, describe what route networks are expected to contribute to Active Travel objectives.

The correct balance has been achieved in relation to the duties placed by the Bill on highway authorities and the type of routes and facilities that are required to be mapped: this level of detail is best explained at the level of guidance rather than regulation. However, such guidance should itself be subject to consultation with the highway authorities and stakeholders including user groups, and to scrutiny by the relevant Assembly Committee.

Having said that design should be by guidance rather than regulation, Cardiff Cycling Campaign believes that many of the problems with poor quality design do not stem from inadequate guidance, rather it is the failure of the providers of infrastructure to follow that guidance. Poor quality design of cycling facilities includes:

- inadequate, substandard widths and junction treatments;
- low quality surfacing, either unsealed or a highly irregular surface;
- inadequate winter and summer maintenance, leading to unusable routes that quickly become inaccessible due to overgrown vegetation.

Any design guidance needs to explain not just the problems in the first of these; it must also ensure that surface quality and maintenance are enhanced in the provision, or upgrade, of new routes. Furthermore, any design guidance must take into account whether dedicated infrastructure is the appropriate intervention. While busy roads with high traffic levels require dedicated facilities for cycling, the vast majority of streets can be made fit for cycling through speed and traffic volume reduction, such as 20 mph or point closures. The importance of overall traffic reduction (through road pricing, parking restrictions combined with provision of alternatives) should also be part of guidance on providing for walking and cycling. Nevertheless, a stronger, central piece of guidance attached to this measure – to which formal recognition is granted and a recommendation to ignore alternatives – will help.

Annexe 18. Are there any other comments you wish to make on the Bill that have not been covered in your response?

We have had, and continue to have, concerns that the requirement on Local Authorities would be interpreted in an insufficiently distinctive way between

the needs of walkers and cyclists, and that Local Authorities would seek to meet the requirement by one route network for both travel modes, without considering route options specifically for each to meet their respective needs. Whilst off-road paths separated from roads that are categorised by high volume and / or speed of traffic should be part of all route development and provision, there must also be on-road cycle route provision to meet active travel objectives.

The proposals need to recognise the work that has been done over the last few years through the Welsh Government's Walking & Cycling Strategy and Action Plan. In particular, the commitments of partners to the Strategy and Action Plan to the development of walking and cycling in Wales, including intra-departmental working within the Welsh Government, must be carried forward by Welsh Government commitments in support of the Local Authorities.

What may be lost in the way that Local Authorities address the needs of pedestrians and cyclists are travel and transport mode objectives in terms of their transport strategies: we have sought to highlight this in our comments about the integration of route development with regional and national transport policies and plans.

Within Cardiff's Sustainable Travel City, we have seen a lack of accountability to cycling development and 'modal shift' as an integral part of transport modal change objectives. This resulted from exclusion of stakeholders such as ourselves in advising and monitoring the programme and in failure to adopt measurable objectives. However, in Cardiff, we have also seen encouraging development work on the Enfys Routes, accompanied by improved expertise with the Authority. We welcome the statement of Cardiff Council, in their response, that, "Welsh Government should set ambitious national targets for increasing walking and cycling for different trip purposes ... requiring local authorities to set locally relevant targets, and demonstrate how their plans / programmes contribute to meeting them. A uniform approach to monitoring transport would then be required across Wales so that the progress towards national targets being met in each local area can be assessed."

For cycling, we strongly support the view taken in the Bill that promotion of cycling is not solely a result of improved infrastructure. A higher quality, safer-feeling environment is critical to increasing levels of cycling. However, increasing cycle use can also be achieved in the shorter term by employing behaviour change measures. A combination of both of these approaches is likely to have the greatest lasting effect on increasing cycling levels.

Cardiff Cycling Campaign has concerns about the combining of the needs of pedestrians and cyclists within a single approach to design of routes. We fully appreciate that in many places well designed routes can be shared by cyclists and pedestrians, however, in general, provision for cyclists is very different from that required by pedestrians. While high speed and heavily trafficked

roads require dedicated off-road infrastructure, the vast majority of streets and roads that connect people with their destinations can be improved simply by reducing traffic volumes and speeds.

Introducing 20 mph limits, which now make up over 90% of the road network of cities like Portsmouth, Oxford and Newcastle, can enable most cyclists to use the road network, while also improving conditions for pedestrians. When combined with measures to deter motor traffic, cycling and walking trips can be made the obvious choice without the need for dedicated infrastructure.

However, we also strongly support the view taken in the Bill that promotion of cycling is not solely a result of improved infrastructure. A higher quality, safer-feeling environment is critical to increasing levels of cycling, however, increasing cycle use can also be achieved in the shorter term by employing behaviour change measures. A combination of both of these approaches is likely to have the greatest lasting effect on increasing cycling levels.

Finally, we believe that even if the actions specified need mainly to be pursued by local authorities there does need still to be a national statement of policy, setting an overall framework and ambition for cycle use, such as the Walking and Cycling Action Plan. This is particularly important for any longer term planning statements, which set the standard for provision of cycle parking and routes in and through new developments.

*Ken Barker  
For Cardiff Cycling Campaign  
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