

## 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 Council is fully supportive of the Active Travel (Wales) Bill and is pleased to contribute to this consultation.

We believe that the general approach set out in the Bill is an excellent way of delivering the infrastructure, which will allow walking and cycling to be the most natural and normal choice for getting around.

The Active Travel Bill will provide a framework for local authorities to gain a greater understanding of their existing walking and cycling networks and identifying the necessary future improvements. We welcome the acknowledgement that walking and cycling play a key role in achieving economic and environmental agendas and ensuring improvements to both physical and mental health.

### **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);**

We fully support the requirement on local authorities to identify and map cycling routes and where appropriate, walking routes. The work has the potential to form an excellent basis for local authorities to establish a clear understanding of the existing infrastructure, travel patterns, key trip generators, barriers to active travel and gaps in the existing provision.

In light of these differences, we propose that the Bill should be refined in terms of the requirements for walking infrastructure. Although mapping cycling routes is manageable, mapping walking routes is impractical, especially for urban authorities with a large number of available walking facilities and routes. Identifying improvements across the whole of the walking network is not an effective use of limited resources given the constrained availability of funding.

Rather we believe a more strategic and focussed approach should identify the barriers to the uptake of walking. We suggest a barrier-led, rather than a route-led approach is adopted, based on the following steps:

- Identify key objectives relevant to each local authority, for example access to schools to tackle childhood obesity; access to rail stations to improve access to employment; access to green spaces to improve leisure/ play opportunities.
- Based on those objectives, identify and map relevant key trip generators (for example schools, district centres, leisure centres, green spaces, health centres, workplaces, public transport interchanges and facilities).
- Identify and map barriers to walking along key routes within an appropriate walking distance of those trip generators. Recognise that the appropriate walking distance will differ according to trip purpose, for example a leisure trip may be a greater distance than a commuting trip.

- Identify solutions to resolve or minimise those barriers (for example junction improvements, surface improvements, or a programme of mass actions such as, dropped kerbs, improved signage and travel action plans).
- Produce a prioritised and costed investment programme.

This approach will provide a more practical and relevant map, as well as prioritising actions to tackle the key barriers to the uptake of walking, for example busy roads or junctions. The framework for identifying interventions needs to be flexible, so local authorities can tailor the approach to their specific problems, opportunities and constraints.

We support the proposal to identify and map enhancements, using a consistent and robust framework. As set out above we believe that for walking, a barrier-led approach to identifying enhancements will be more practical than a route based approach. Whilst for cycling, a combination of barrier and route based approaches would be more appropriate. In both cases, this would allow priority areas for intervention to be identified, as it is impractical to appraise all possible walking and cycling routes across an authority.

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

In principle we fully support the requirements on local authorities to have regard to integrated network maps in the local transport planning process.

Although the Active Travel (Wales) Bill states that '*each local authority must, in developing policies under section 108(1) (a) or (2A) of the Transport Act 2000 (policies forming basis of local transport plans), have regard to the integrated network map for its area*'. It is our understanding that local authorities no longer have to produce local transport plans, as in 2006 the Welsh Government exercised powers under the 2006 Act to require local authorities to work together as Regional Transport Consortia in producing plans for their areas<sup>1</sup>.

Cardiff Council has already developed a Strategic Cycle Network Plan for the city. This plan is based on a wealth of evidence including an audit of the existing network, which informed the definition of the plan targeting populations identified as having a high propensity to cycle. The plan has proved to be an invaluable tool, enabling future programmes to be effectively developed and managed, with cycling improvements prioritised and delivered on a corridor based approach. This both maximises the benefits to the local community and provides value for money. We think it is essential that the development of integrated network maps are evidence based.

Cardiff Council has also developed an approach to identifying potential barriers to walking and cycling, which is 'area-based' and is part of the work on Safer Routes in Communities schemes. This barrier-led assessment allows the identification of works which would improve conditions along a much wider range of routes. The approach has particularly focused on what are termed 'no choice' zones or junctions. These are areas through which all movements are funnelled due to 'severance' caused by natural or man-made structures such as rivers, railway lines or major roads. These identified barriers were then further prioritised according to a range of information and data including accidents, proximity to key trip attractors (for example schools,

---

<sup>1</sup> <http://www.assemblywales.org/gg11-0008.pdf>

shops etc) and a subjective assessment of the benefits to pedestrians and cyclists in terms of convenience, accessibility, comfort, safety and attractiveness.

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

We fully support the requirements on local authorities to continuously improve routes and facilities for pedestrians and cyclists. However, this will need to be supported by a funding commitment from the Welsh Government to enable the value of the integrated network maps to be fulfilled, but delivery of the identified enhancements will also need a flexible approach to ensure opportunities can be maximised and problems solved as they arise.

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

We fully support this proposal. Guidance will be required from the Welsh Government, to ensure that road schemes cannot be delivered without fully considering the needs of pedestrians and cyclists, as the Explanatory Memorandum does not currently state that guidance will be issued for this provision.

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

We note that the following suggestions within our previous response on the White Paper have not been taken into account within the proposed Bill:

- We suggested that the requirements for delivering networks for walking and cycling should differ. While we agree a route based approach to delivering a cycle network is appropriate, we believe a more strategic and focussed approach should identify the barriers to the uptake of walking. We suggested a barrier-led, rather than a route-led approach is adopted.
- We suggested that as both the cycling and walking networks will in the main serve local rather than regional trips that they should be delivered through budgets allocated to each local authority rather than on a regional basis.
- We suggested that a ring-fenced Active Travel grant, independent of the RTP and allocated to local authorities according to population and quality of plans/interventions should be considered.
- Quality of design is key to ensure that schemes will have an impact on travel behaviour. On this basis we suggested that there is a need for an independent body to assess the design quality of plans/interventions. Further that there is the need for local authorities to adopt and adhere to agreed design guidance which very clearly has the hierarchy of provision as one of its guiding principles.
- We recommended greater reference to the key role played by smarter choices programmes (for example Bike It projects, Workplace and School Travel Action Plans; personalised travel planning; transport information and marketing; travel awareness campaigns; car clubs; car sharing schemes) in supporting and maintaining behavioural change.
- We suggested the need for ambitious national targets related to trip purposes, with a requirement on each local authority to develop locally relevant targets which can demonstrably contribute to the national targets.

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

We believe smarter choice programmes, speed reduction and modal shift targets are also key provisions in delivering the aim of the Bill.

The key role of smarter choices programmes and measures in supporting and maintaining behaviour change should be recognised within the Bill (for example Bike It, Workplace and School Travel Action Plans; personalised travel planning; public transport information and marketing; travel awareness campaigns; car clubs; car sharing schemes).

There is potential for greater emphasis on traffic speed reductions, such as the introduction of 20mph zones, through the promotion of the hierarchy of provision set out in Manual for Streets. This hierarchy advocates a shift from street design approaches based purely on the importance of movement of motor traffic, to a focus on the reduction of volumes and speeds of traffic, the treatment of junctions/hazards and traffic management solutions. The emphasis on the Manual for Streets hierarchy of provision would improve conditions for all road users.

There are currently no targets for increasing walking and cycling in Wales. We believe that Welsh Government should set ambitious national targets for increasing walking and cycling for different trip purposes. If the Welsh Government could make this commitment, then the duty could require 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.

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

The effectiveness of the Bill will be dependent on the availability of funding to deliver the enhancements identified by local authorities, which is not taken account within the Bill. It is critical that walking and cycling funding is available for local authorities across Wales and that in this time of austerity, investment in walking and cycling infrastructure is prioritised. The current provision of walking and cycling investment levels are insufficient for all 22 local authorities to deliver enhancements to their walking and cycling networks that will be of the scale required to maximise the uptake of sustainable modes of travel. The funding will need to be secured for the long term to ensure local authorities are able to fulfil the key provision *'to continuously improve routes and facilities for pedestrians and cyclist'*.

Other barriers to the implementation of the Bill are availability of resources within local authorities, both in terms of officer time and funding to develop and print the maps, due to the scale of work required, including auditing existing cycling and walking infrastructure. This is particularly relevant to urban authorities, due to the length of the available walking network alongside all streets and roads, together with traffic tree routes through parks and open spaces. This has not been taken account within the Bill. Therefore, there is a need for local authorities to be able to adopt a flexible approach and identify the areas that require their attention to be focused.

**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.**

### **Costs**

- Costs to manage and undertake data collection, consultation and production of the maps.
- Ongoing staff time to review and update the maps.
- Staff costs to manage the delivery programme (funding availability, design costs, Traffic Regulation Orders etc) and the delivery of schemes.
- Capital costs of delivering schemes (if delivered through Council capital programmes).
- Cost of publicity and communication materials (including printing of maps).
- Possible compensatory payments to landowners for increasing paths status if local authorities undertake the rights of way revisions.

### **Benefits**

- Clearer identification of aims and aspiration for walking and cycling.
- Recognition and endorsement to develop and maintain a network of safe, convenient traffic free routes to promote health and wellbeing.
- Acknowledgement of the key role active travel plays in transport, health, accessibility, sustainability and other broader agendas.
- Promoting sustainable travel; offering alternative modes of transport; promoting the health agenda; increasing access to the countryside; protecting the environment; enhancing the tourism potential.
- Help to achieve the aspiration of delivering 'Sustainable Neighbourhoods' in new and existing developments.
- Promoting walking and cycling priorities within transport programmes.
- Designing and delivering walking and cycling improvements as part of other highway or development works.
- Greater quality consistency of provision across Wales.
- Improving local and visitor access to active travel information.

**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?**

Although, the proposed Bill sets out detailed requirement of local authorities to identify existing and integrated network maps, we feel that detailed guidance will also be required to support and assist local authorities.

We also think the requirements of the Bill could be strengthened to state clearly that it does not expect the integrated network maps to cover the local authority area in the first map, This could also be detailed more specifically within the accompanying guidance, as it is expected that the maps will need to be updated every 3 years, this will enable additional areas to be identified in the next phase of the plan.

We also think that local authorities should be required to develop prioritised costed programmes, together with a need to develop an evidence base that justifies the

integrated network maps developed by each local authority, which should be set out in the Bill.

Furthermore, guidance should also be provided that considers new walking and cycling links alongside road schemes and a complementary programme of smarter choice measures required to maximise the investment in the physical infrastructure.

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

-