

Enterprise and Business Committee

Meeting Venue:
Committee Room 3 – Senedd

Meeting date:
18 April 2013

Meeting time:
13:15

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



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Agenda

Pre-meeting (13.20 – 13.30)

1. Introductions, apologies and substitutions

2. Active Travel (Wales) Bill: Stage 1 – Evidence Session 8 (13.30 – 14.15) (Pages 1 – 15)

Dr Kevin Golding-Williams, Policy and Public Affairs Manager, Living Streets
Gwenda Owen, Community Engagement Officer, Ramblers Cymru

3. Active Travel (Wales) Bill: Stage 1 – Evidence Session 9 (14.15 – 14.45) (Pages 16 – 23)

Dr Hugh Mackay, Member of the Executive, CTC Cymru

Break (14.45 – 15.00)

4. Active Travel (Wales) Bill: Stage 1 – Evidence Session 10 (15.00 – 15.30) (Pages 24 – 34)

Jont Bulbeck, Team Leader, Recreation Access and Tourism, Natural Resources Wales
Ceri Davies, Executive Director, Knowledge, Strategy and Planning, Natural Resources Wales

De-brief (15.30 – 15.40)

Living Streets Response to the Enterprise and Business Committee Consultation on the Active Travel (Wales) Bill

Introduction

We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with communities, professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy the benefits of walking.

Response to the 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

- 1.1 The Active Travel Bill provides the opportunity to utilise a range of economic, legislative and policy based tools to encourage people to shift their travel mode from motorised transport to walking. In Wales walking comprises 22% of all trips against two thirds made in either a car or van¹ which means that there is a strong walking foundation to build on. Walking is the first part of any journey from the front door and the Active Travel Bill is needed to shift attention and funding towards non-motorised transport such as walking. Walking is the first step of any travel activity due to the high levels of participation and the ease by which it can be undertaken which can act as a link to more complex modes of active travel such as cycling. However, there are challenges. Following an increase from 37% for 1995/99 to 45% in 2007/08 in the number of respondents stating that they walk to school in Wales subsequent surveys have revealed a decrease to 36% in 2008-09 and to 28% in 2009/10. This is a pattern reflected in the National Travel Survey 2011 results for England and Wales which revealed that the average number of walking trips has decreased by 24% compared to 1995/7². The Active Travel Bill also provides an opportunity to support the integration of walking into longer journeys through travel to and from train stations and other transport hubs which will help increase the number of walking trips per person.
- 1.2 The Active Travel Bill provides the opportunity, through investment in walking, to cut down the volumes of motorised transport and reducing congestion in addition to increasing economic activity on local high streets and deliver significant health savings. For example, research has shown that people on foot tend to linger longer and spend more and shows that making town centres better for walking can boost trading by up to 40%³. The cost

¹ <http://wales.gov.uk/docs/statistics/2012/120320sb252012en.pdf>

² <https://www.gov.uk/government/publications/national-travel-survey-2011>

³ TfL <http://www.tfl.gov.uk/gettingaround/walking/2896.aspx>

implications of poor health related to low levels of exercise have been found to be substantial. Cardiovascular disease alone was estimated to cost the UK economy £29 billion in 2004 in care costs and lost productivity⁴, whilst the cost to the NHS of elevated body mass index (BMI) was estimated at £7 billion in 2001, with a predicted increase to £27 billion by 2015⁵. Mental health problems have been estimated to cost the UK economy £106 billion in 2009/2010 in care costs, lost productivity and reductions in quality of life⁶. Given these figures, increasing regular walking in the population through investments in walking environments could contribute to considerable cost savings. A recent *Lancet* study revealed that increased levels of walking and cycling has the potential to save the National Health Service over £17 billion pounds, over the course of 20 years, through reductions in the prevalence of type 2 diabetes, dementia, ischaemic heart disease, cerebrovascular disease, and cancer because of increased physical activity with further costs would be averted after 20 years⁷. The Active Travel Bill will allow for such significant financial savings to be achieved in Wales.

- 1.3 Walking can have a number of positive health outcomes. Walking reduces the risk of all-cause mortality by up to 20% and cardiovascular disease by up to 30%⁸ (meaning that regular walkers are likely to live longer than non-walkers). Walking reduces the risk of high blood pressure^{9,10,11}, stroke, and high cholesterol¹². Walking expends energy and therefore can help energy balance and body composition^{7,13} (potentially reducing obesity). Walking can also improve mental health and well-being, by having a positive impact on self-esteem, physical self-worth¹¹, stress, mood and mindset¹⁴. Studies have shown, for example, that in older women walking can reduce anxiety¹⁵ and depressive symptoms¹⁶. For this group, walking has been found to be as effective as other forms of physical activity in achieving reductions in anxiety and depression¹⁴, with several short sessions per week being more effective than one long session¹⁵, suggesting that walking around the local neighbourhood may provide an important source of physical activity. Children can also gain health benefits from walking. Regular walking of around 20 minutes per day can

⁴Luengo-Fernández, R., Leal, J., Gray, A., Petersen, S., Rayner, M. 2006. Cost of cardiovascular diseases in the United Kingdom. *Heart* 2006;92:1384–1389.

⁵McPherson, K., Marsh, T., Brown, M. 2007. Tackling Obesities: Future Choices - Modelling Future Trends in Obesity and the Impact on Health. 2nd Edition. Government Office for Science, London.

⁶Centre for Mental Health. 2010. The economic and social cost of mental health problems in 2009/10. The Centre for Mental Health, available at http://www.centreformentalhealth.org.uk/pdfs/Economic_and_social_costs_2010.pdf.

⁷The Lancet, Volume 379, Issue 9832, Pages 2198 - 2205, 9 June 2012 [http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(12\)60766-1/fulltext](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(12)60766-1/fulltext)

⁸Hamer, M., Chida, Y. 2008. Walking and primary prevention: a meta-analysis of prospective cohort studies. *British Journal of Sports Medicine* 42: 238-243.

⁹Kelley, G.A., Kelley, K.S., Tran, Z.V. 2001. Walking and resting blood pressure in adults: A meta-analysis. *Preventive Medicine* 33: 120-127.

¹⁰Murphy, M.H., Nevill, A.M., Murtagh, E.M., Holder, R.L. 2007. The effect of walking on fitness, fatness and resting blood pressure: A meta-analysis of randomised, controlled trials. *Preventive Medicine* 44: 377-385.

¹¹Lee, L.-L., Watson, M.C., Mulvaney, C.A., Tsai, C.-C., Lo, S.-F. 2010. The effect of walking intervention on blood pressure control: a systematic review. *International Journal of Nursing Studies* 47:1545-1561.

¹²Legrand, F.D., Mille, C.R. 2009. The effects of 60 minutes of supervised weekly walking (in a single vs. 3-5 session format) on depressive symptoms among older women: Findings from a pilot randomized trial. *Mental Health and Physical Activity* 2: 71–75.

¹³McAuley, E., Blissmer, B., Katula, J., Duncan, T.E., Mihalko, S.L. 2000. Physical activity, self-esteem, and self efficacy relationships in older adults: A randomized controlled trial. *Annals of Behavioural Medicine* 22(2):131-139.

¹⁴Roe, J., Aspinall, P. 2011. The restorative benefits of walking in urban and rural settings in adults with good and poor mental health. *Health & Place* 17 (2011) 103-113.

¹⁵Heesch, K.C., Burton, N.W., Brown, W.J. 2010. Concurrent and prospective associations between physical activity, walking and mental health in older women. *J Epidemiol Community Health* (2010). doi:10.1136/jech.2009.103077.

¹⁶Legrand, F.D., Mille, C.R. 2009. The effects of 60 minutes of supervised weekly walking (in a single vs. 3-5 session format) on depressive symptoms among older women: Findings from a pilot randomized trial. *Mental Health and Physical Activity* 2: 71–75.

increase their physical¹⁷ and mental¹⁸ performance. Children who travel by walking use twice as many calories as those who travel by car¹⁹ and, over the course of a week, use about the same amount of calories as those used during PE lessons in school¹².

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);**

- 2.1 Living Streets welcomes the requirement on local authorities to identify and map current and potential future walking routes and align this data through the identification of enhancements to create an integrated network.
- 2.2 The reference to local authorities consulting local communities within the Active Travel Bill is welcome but we are surprised that the process of consultation is not considered in the sections of the Regulatory Impact Assessment regarding continuous improvement (pp26-27) and integrated network maps (pp24-26). Early engagement with communities will be vital to ensure the identification process is democratic, open and transparent. We would like to see the guidance accompanying the Active Travel Bill providing practical support regarding community engagement to assist local authorities in making decisions regarding investment in the public realm to encourage walking. One potential mechanism for undertaking this is Living Streets Community Street Audits - where small groups of local residents, traders, councillors and council officers, including vulnerable street users, are involved to assess a route on foot and identify problems and potential improvements. Improvement activity varies widely between projects according to the key needs identified by communities, and tend to fall into three main categories: community-led improvements such as litter picking, clean ups and planting; more in-depth improvements such as resurfacing or lighting improvements led by the local authority, and awareness-raising activities such as led walks, the design of maps and street parties.
- 2.3 The Regulatory Impact Assessment notes ‘*Local authorities will not be required to commit additional funding above what is already being spent on active travel as a consequence of this piece of legislation. However, they will be encouraged to invest in active travel*’ (para 95). We believe the Active Travel Bill and supporting guidance could act as a catalyst for innovative funding mechanisms to enhance active travel by recognising the economic benefits of increased numbers of people walking for local authorities and other public bodies through reduced congestion, improvements in health, road safety and economic regeneration.
- 2.4 Paragraph 48 of the Regulatory Impact Assessment refers to the enabling role of route identification whilst paragraphs 54-55 refer to the engaging role of the maps. Whilst both approaches may have an enabling and engaging effect on peoples’ travel modes we believe these actions are merely the starting points for enabling and engaging the public

¹⁷Mønness, E., Sjølie, A. N. 2009. An alternative design for small-scale school health experiments: does daily walking produce benefits in physical performance of school children? *Child: care, health and development*, 35(6): 858-867.

¹⁸ [http://www.jpeds.com/article/S0022-3476\(13\)00015-2/abstract](http://www.jpeds.com/article/S0022-3476(13)00015-2/abstract)

¹⁹Mackett, R.L., Lucas, L., Paskins, J., Turbin J. 2005. The therapeutic value of children’s everyday travel. *Transportation Research Part A* 39: 205-219.

- and we make further recommendations regarding this point in relation to behaviour change in our response to question 4.
- 2.5 We are concerned by the statement contained within the Regulatory Impact Assessment regarding the intention of the Welsh Government to review the legislative provisions five years after the first set of maps have been produced. We believe this period is too long. Given local authorities are required to produce their existing route maps within three years of the commencement date it is possible such a review may not take place until 2022. Eight years after the Bill is likely to become enacted.
- **the requirement on local authorities to have regard to integrated network maps in the local transport planning process (section 6);**
- 2.6 We welcome the proposed statutory link between the proposed integrated network maps and the development of policies forming the basis of local transport plans.
- **the requirement on local authorities to continuously improve routes and facilities for pedestrians and cyclists (section 7);**
- 2.7 We welcome the proposal to continuously improve routes and facilities for pedestrians through the development of new road schemes. However, it is vital that sufficient emphasis is placed on the maintenance of both new and existing walking infrastructure. We know this is an issue for the public as our own market research, reveals that a third of Welsh adults (37%) would walk in their local area more if the streets were kept in better condition.
- 2.8 We believe it is vital that the Welsh Government support the Active Travel Bill with a package of financial support particularly around behaviour change programmes beyond the current £14.3 million per annum direct funding for active travel related projects (para 96 Regulatory Impact Assessment) as opposed to the statement contained within the Regulatory Impact Assessment that *'all of the direct costs associated with the legislation are expected to fall on the local authorities in Wales'* (para 59). Interventions to increase walking levels have significant returns and deliver value for money. For example, Living Streets' Fitter for Walking programme involved approximately 150 communities, across 12 local authority areas and 5 regions of England, selected based on low reported levels of physical activity and high levels of obesity. Working with the community group, the local authority and other local stakeholders, Living Streets helped identify barriers to walking in the area and potential improvements. The programme as a whole underwent a comprehensive independent evaluation in 2011²⁰ which revealed a benefit cost ratio for decreased mortality as a result of more people walking of up to 46:1. Furthermore, walking interventions can be delivered at relatively low cost. For example, Living Streets Walk once a Week (WoW) project delivered for the Department of Health in England cost £2.23 per child and achieved a 59% participation rate. Extra investment in outreach model which includes intensive support for participating schools costs an additional 86p/child and generates an 11% additional increase in walking. This equates to an average cost of £500 per school.

²⁰ Adams *et al*, 2011

http://www.livingstreets.org.uk/sites/default/files/content/library/Evaluations/FFW_Economic_Evaluation_Final_Feb_2012.pdf

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

2.9 Whilst enhancements, upgrades and new infrastructure to walking routes are welcome it is vital that revenue streams exist for their long term maintenance. Equally, walking routes which already exist need to be well maintained in order to deliver the Bill's aim of making walking the most natural and normal way of getting about. In order to facilitate this we would recommend that Statutory Guidance should support the bill (as suggested on page 13 of the Explanatory Memorandum) and within that a recommendation that local authorities should allocate funding to walking and cycling routes on a pro-rata basis against funding for roads based on the number of users. This would be a non binding target and would, therefore, allow for funding decisions to be made at the local level. However, it would send a clear message from Welsh Government to local authority leaders that walking and cycling routes are as important as routes for motor vehicles. This measure is likely to prove popular as our own market research, undertaken in March 2012, revealed that 79% of Welsh adults felt that their council should pay at least as much attention to keeping the pavements safely maintained as they do to the maintenance of the roads.

2.10 We welcome the statement regarding shared use contained within the Welsh Government's response to the Active Travel Bill White Paper '*Outcome of the Active Travel (Wales) Bill White Paper consultation*'. It states '*It is our intention that walking and cycling are considered separately, as pedestrians and cyclists have different needs. Shared space might be appropriate in some places, but not everywhere. Mapping and providing shared space routes only would not meet the aims of the Bill, as it would not lead to wide enough provision*' (page 3). This statement supports the clear user hierarchy, outlined in *Manual for Streets*, in which pedestrians are considered first in the design process followed by cyclists, public transport, specialist service vehicles and lastly other motor traffic. Pedestrians are the most vulnerable group of road users in the transport hierarchy and yet are the most numerous. At Living Streets, our supporters tell us that pavement cycling is a real problem for them – particularly those who are older or have mobility issues. Furthermore, it is important to note that the number of pedestrians heavily outnumber the number of cyclists. The 2011 Department for Transport National Travel Survey revealed that 22% of the average number of trips comprised walking against 2% for cycling. Therefore, Instead of reallocating space away from pedestrians towards cyclists we want to see the reallocation of road space away from motor vehicles towards cyclists and an improvement in infrastructure to support cycling.

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.

3.1 In our original consultation response to the White Paper consultation we proposed that local communities be encouraged to use such consultation processes to propose and challenge local authorities not only to deliver capital intensive enhancements to encourage walking but also low cost improvements which would encourage increased levels of walking. This "right to request" could include the introduction of a 20mph limit, introduction or retention of pedestrian crossings or removal of street clutter in their local community.

- 3.2 As we stated in our response to the White Paper consultation we believe there needs to be clear process for local authorities to identify and map walking routes and, therefore, guidance will be vital. Statutory Guidance or Secondary Regulation would add teeth to the Active Travel Bill requirements. However, it is important to note that supporting guidance for the Bill will need to go beyond only concerning the types of routes and facilities which should be mapped. It will need to include the key elements of enabling and engaging people to deliver behaviour change in modal choices. This is currently absent from the Active Travel Bill in its current form (see our responses to questions 4, 5 and 7 for further details).
- 3.3 We also believe that the Active Travel Bill has missed an opportunity to include a Duty on local authorities to appoint an elected member to champion walking in the local authority and oversee the implementation and monitoring of walking interventions across the local authority as recommend in our response to the White Paper consultation. Increasing the number of people walking relies on a number of local authority departments working together to deliver walking interventions and to improve the quality of the streets. These can range from departments as varied as transport, education, street cleansing, and regeneration amongst others.

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

- 4.1 We believe the key provisions of the Bill must be expanded to recognise the broader policy changes required in order to deliver the aim of the Bill. For example, in order to achieve the Active Travel Bill's aim of enabling more people to walk and cycle support from the Welsh Government to local authorities to implement 20mph limits is vital through the accompanying guidance coupled with a long term vision to make 20mph the default speed limit across Wales. We believe reducing vehicle speeds on streets in Wales is the single biggest measure to transforming streets into safe, people-centred streets, rather than simply corridors for traffic. In fact, reducing the speed of traffic to 20 mph in urban areas has many health, economic, environmental, and social benefits.²¹ Furthermore this safer environment helps to reduce the likelihood of accidents as well as perceived danger thereby increasing the number of people making active travel choices. Moreover, evidence has shown that where 20 mph limits have been introduced there has been a decrease in the number of KSIs including amongst cyclists *and* pedestrians²².
- 4.2 The key provisions should make reference to the requirement for public bodies with responsibility for public health, economic regeneration and road safety such as Public Health Wales and the four police forces responsible for road safety to work in partnership with local authorities to support active travel through the inclusion of a 'duty to co-operate' for such organisations with the Bill.
- 4.3 The key provisions as they currently stand fail to address the most important requirement in order for the Bill *'to enable more people to walk and cycle and generally travel by non-motorised transport. We want to make walking and cycling the most natural and normal*

²¹ <http://go20.org/why-go-20/>

²² The introduction of 20 mph zones was associated with a 41.9% reduction in road casualties. Injuries to pedestrians were reduced by a little under a third. There was a smaller reduction in casualties among cyclists of 16.9%. Source: <http://www.bmj.com/content/339/bmj.b4469>

way of making getting about.’ (Regulatory Impact Assessment, paragraph 14). The Bill makes reference to enabling more people to walk through the duty to identify and map walking routes but makes no reference to measures to enable and engage beyond that. There is little reference to the Welsh Government’s wider approach to changing attitudes towards walking in order to make it the most natural and normal way of getting about. We note that reference is made to the Active Travel Action Plan in section 10 ‘post implementation review’(p43) of the Regulatory Impact Assessment yet there is no detail as to the broader work programme such as potential behaviour change measures. We believe behaviour change should be clearly stated in the key provisions of the Active Travel Bill reinforced with supporting guidance in order to increase the number of people walking to school, work and for health. Therefore, the Active Travel Bill must go beyond merely the statement of intent highlighted in the Explanatory Memorandum that ‘*changing travel behaviour also includes promoting routes to the public*’ (para 22) it must not just promote but also enable and support behaviour change in order to increase the number of people walking.

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

- 5.1 Walking can be made the natural choice for short journeys through a dual approach. Firstly, through direct interventions based on promoting walking and secondly by creating safe, attractive, enjoyable streets which are conducive to walking. The Active Travel Bill supports the latter but not the former approach. The combination of these two activities can have multiple evidenced benefits which relate to desired Government policy impacts including public health, climate change, reducing congestion, community cohesion and local economic performance. We would like to see these cross cutting policy benefits strongly reflected in the Active Travel Bill and supporting guidance currently in development through political leadership to ensure co-ordination across different government departments.
- 5.2 Direct walking interventions and a cross cutting approach to policy delivery would help tackle the cultural barrier to walking described in the Explanatory Memorandum supporting the Active Travel Bill ‘*the lack of a walking and cycling culture, where walking and cycling is seen as the most natural and obvious way of making shorter journeys. The absence of this culture leads to a perception that walking and cycling is something abnormal, done by eccentrics and enthusiasts only. The provisions we would like to see in the Bill are aimed at both infrastructure improvements and enabling people to change their behaviour through promoting and normalising active travel*’ (Para 17).
- 5.3 Furthermore, it is an important point to note that whilst walking and cycling are both forms of active travel they are very different travel modes and accordingly require different approaches which must be reflected in the developing guidance supporting the Active Travel Bill. *Manual for Streets* establishes a clear user hierarchy in which pedestrians are considered first in the design process followed by cyclists, public transport, specialist service vehicles and lastly other motor traffic.
- 5.4 Finally, we are concerned about the proposed 2,000 population threshold for the inclusion of settlements in the mapping requirements as described in paragraph 19 of the

Explanatory Memorandum ‘.....smaller settlements....will be included in the mapping requirements in the Bill under the proposed population threshold (2,000 people)’ We believe this may act as a barrier to supporting walking in smaller settlements to the detriment of local communities. Population size should be but one of a number of factors which should be considered in the emerging supporting guidance such as the views of local communities.

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.

6.1 There are numerous benefits arising from the Active Travel Bill some of which are described in the Impact Assessment which accompanies the Bill. However, there is a lack of reference to studies which consider the economic benefits of improvements to the walking environment. In particular we believe the Regulatory Impact Assessment has omitted a number of research studies which is reflected in the statement ‘*Most of the economic evidence relates to cycling, with far less quantified information available on the benefits of walking or investment in walking related infrastructure. This absence of evidence in relation to walking should not be regarded as an absence of benefit from encouraging or enabling people to complete journeys on foot*’ (para 116).

6.2 A literature review of the economic benefits of walking by the University of the West of England and Cavill Associates²³ revealed that investment in high quality walking environments increases in economic value and economic activity in the local area. Previous research has revealed such increases reflected by the sale price of residential property^{24,25} and the rental price of retail premises^{25,26,27}. The impacts on economic activity of walking investments have been examined using property sale and rental prices as an indicator. A number of studies have used the Pedestrian Environment Review System (PERS) developed by Transport Research Laboratory^{26,27,28} to examine the economic impact of enhancement of the public realm. This system has been used in combination with the sale price of flats, the rental price of Retail Zone A property (i.e. the most valuable retail premises), a stated preference analysis with willingness to pay for improvements to the public realm and an analysis of stakeholders from the retail sector. These studies revealed:

- The sale price of flats in London were significantly greater in areas with higher quality pedestrian environments²⁴ (all other factors being considered);
- Twelve public realm improvement schemes in London were associated with an above average growth in the sale price of nearby flats of between 0.9% and 28% per annum (average of 7%)²⁴;

²³ <http://www.livingstreets.org.uk/sites/default/files/content/library/Reports/Making%20the%20Case%20full%20report.pdf>

²⁴ MVA. 2008. Valuing Urban Realm: Seeing Issues Clearly. Report for Design for London. Available from [http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-\(1\).aspx](http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-(1).aspx).

²⁵ Accent. 2006. Valuing Urban Realm: Business Cases for Public Spaces. Technical Report to Transport for London. Available from [http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-\(1\).aspx](http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-(1).aspx).

²⁶ MVA. 2008. Valuing Urban Realm: Seeing Issues Clearly. Report for Design for London. Available from [http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-\(1\).aspx](http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-(1).aspx).

²⁷ Accent. 2006. Valuing Urban Realm: Business Cases for Public Spaces. Technical Report to Transport for London. Available from [http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-\(1\).aspx](http://urbandesign.tfl.gov.uk/Valuing-Urban-Realm/Project-History-(1).aspx).

²⁸ CABE Space. 2007. Paved with Gold: The real value of good street design. CABE Space, London.

- Public realm improvement schemes that had an emphasis on pedestrian priority were associated with a 12% growth in the sale price of flats, those with an emphasis on decluttering or materials and fixtures a growth of 7% and 3% respectively²⁴.

6.3 We were also disappointed to see an absence of walking examples in the section entitled '*evidence on the impact of interventions to promote active travel*' (p32). A number of our walking interventions have been independently evaluated and verified. For example, these include:

- Walk to School project for Department of Health: Working with 736 schools and over 118,000 children to increase walking levels in school in England. 61,567 children and 6,515 parents took part in surveys which revealed a 25 % increase in numbers of children walking to school (during the project lifetime) and a 35% decrease in car use. Before the WoW intervention, schools had a 43% walking proportion, and following the WoW interventions schools reached a peak of 59% walking in 2011, levelling at 54% in 2012 (the final year). Furthermore, a recent walk to school outreach pilot project in Hertfordshire saw walking increase from 46% to 53% and driving decreasing from 36% to 19%;
- Step Out in London: a project funded by London Councils which promoted walking in locations where there had been recent physical improvements to the pedestrian environment. Through a series of promotional activities the project sought to publicise the value of walking to the local community and increase the number of people walking locally. As part of the SOL project people were encouraged to make 'pledges' to walk more and follow up surveys show that between a fifth to two fifths said they walked more, and up to 82% said they walked more as part of project activities including pledges, so the pledge can be seen as part of a combination of measures successfully increasing levels of walking;
- Fitter for Walking: the project was part of the Active Travel Consortium funded by the Big Lottery in five areas across England, and ran from 2008-2012. The project helped 150 communities across the UK to reclaim their streets for walking, and was greatly supported with over £450,000 worth of street improvements from partnering local authorities. An independent evaluation showed that as a result of the project, 86% of the projects resulted in more pedestrians walking in the area, and 78% of the individuals reported an increase in their day to day walking levels. 64% of those still reported an increase in walking six months later.

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?

- 7.1 Living Streets believes that guidance and support for local authorities will be crucial during the process of identifying and mapping walking routes in order to ensure that best practice is shared and local authority officers and members can share experiences.
- 7.2 However, we are concerned that behaviour change interventions are absent from the Bill (as highlighted in our responses to questions 4 and 5) and are only briefly highlighted in a reference to the Active Travel Action Plan in section 10 '*post implementation review*' (p43) of the Regulatory Impact Assessment yet there is an absence of detail of walking interventions to deliver behaviour change. We believe behaviour change should be clearly stated in the key provisions of the Active Travel Bill reinforced with supporting guidance in order to increase the number of people walking to school, work and for health.

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

- 8.1 We believe there are significant opportunities to increase the number of children walking to school and adults walking to work in Wales through our recommend amendments to the Active Travel Bill and accompanying guidance and by the Welsh Government supporting effective walking interventions such as those highlighted below.
- 8.2 Living Streets have operated the national Walk to School (WtS) campaign since 1995 and aims to encourage all parents and young people to make walking to school part of their daily routine, emphasising the benefits to physical and mental health and wellbeing, the social aspects and the potential to address congestion, improve air quality and reduce carbon emissions. Over 1.9m children and nearly 6,800 schools nationally take part in Living Streets Walk to School activities each year making it the UK's largest walk to school scheme.
- 8.3 Living Streets also operates the Walking Works programme which has engaged with adults in employment to encourage more walking to, from and at work. Funded by BIG Lottery's Health and Wellbeing Fund as part of the Travel Actively consortium, the campaign has raised awareness of the benefits of walking more to over 28,000 individuals so far, through walking pledges, regular digital campaigns and the annual Walk to Work Week challenge. Walking Works includes a programme of more in-depth support for workplaces, including helping establish 'walking champions', running bespoke walking challenges and activities and helping workplaces to integrate walking activity with their workplace travel plan. Walk to Work Week is the aspect of the Walk to Work programme with the widest participation and the most significant evaluation data. Evaluation data reveals that since participating in Walk to Work Week, 57% of respondents felt that their overall level of walking had increased. Furthermore, all respondents were asked how they felt after taking part in the project. The top three responses were 'I feel fitter' (45%), 'I feel more healthy' (41%) and 'I am more active' (39%). Individuals achieving 30 minutes or more physical activity on five or more days per week increased from 29% at registration to 50% at follow up.

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Ramblers Cymru Evidence on the general principles of the Active Travel (Wales) Bill

- Ramblers Cymru is the representative body of The Ramblers' Association in Wales.
- The Ramblers works to help everyone realise the pleasures and benefits of walking, and to enhance and protect the places where people walk. We are committed to encouraging and supporting walking, 'the nearest activity to perfect exercise' (Morris and Hardman 1997¹), as a health-promoting physical activity.
- As Britain's walking charity, the Ramblers is at the heart of walking, with around 6,000 members in Wales, 115,000 nationwide, about 18,000 volunteers, and a network of around 500 local Groups, over 40 of these in Wales. Through these Groups we offer over 38,000 led walks which attract half a million participants each year, covering all types of terrain and levels of ability.
- Although perhaps best known for our work to protect and enhance the walking environment, especially rights of way and other access for walkers in the countryside, we are also active in towns and cities, and work extensively to promote walking and to encourage and support people to walk more. Ramblers' volunteer-driven led walks programme offers over 500 walks a week, including an increasing number of shorter and easier walks and walks suitable for families with children.
- We also deliver projects that specifically target insufficiently active people, those from socially excluded communities and those that suffer from health inequalities.
- We welcome the opportunity to present evidence to the Enterprise and Business Committee tasked with scrutinising the Welsh Government's Active Travel (Wales) Bill.

¹ 'Walking to health' in *Sports Medicine* 23 Jerry Morris and Adrienne Hardman 1997

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

It is widely recognised that an increase in active travel is of benefit to the health and wellbeing of a nation² but it would seem that at times these benefits are given insufficient weight to prioritise the facilities and other measures that will have greatest effect in achieving them.

A number of initiatives are in place at local, regional and national levels aimed at increasing walking and cycling. Guidance exists as to street design, active travel plans and safe routes are developed but there is, despite best efforts, a certain amount of disjointedness in the provision.

Further amongst this patchy development the walking environment is often ignored and assumptions made on the acceptability of shared facilities in restricted space which we would at times question.

We see this Bill, if accompanied by robust guidance, as having the potential to improve, consolidate and maximise the positive impact of existing and new measures by bringing active travel to the forefront of transport and planning decision making.

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)
- The requirement on local authorities to have regard to integrated network maps in the local planning process (section 6)
- The requirement on local authorities to continuously improve routes and facilities for pedestrians and cyclists (section 7)
- The requirement on highway authorities to consider the needs of pedestrians and cyclists when creating and improving new roads (section 8).

We recognise the value of the above and strongly support the decision to map walking and cycling routes separately. As the Bill addresses utility rather than leisure journeys it is important that both the existing route maps and integrated network maps take into account the way in which the network will be used in the future as well as current use when deciding what is appropriate for inclusion.

² Healthy Transport=Healthy Lives British Medical Association 2012

We feel that the Bill and guidance must be worded to ensure that the design of new routes takes into account the fact the developments planned under the Bill should release suppressed demand. Whilst current usage may suggest that shared facilities can properly be considered, given planned and desired growth this may soon prove not to be the case.

Active travel routes used by many cyclists will need to meet the demand for fast, direct and uninterrupted passage. Walking is undertaken in a different way from most commuter cycling and demands at times a different environment; paths on which children and adults can walk relatively uninterrupted. We do not walk in straight and regimented lines and a failure to recognise the differences results in facilities that serve neither group of active traveler. Very little of the network is or will be through spacious parks where shared paths can work; it will be in busy streets with junctions and obstacles. To create a network that results largely in cyclists being removed from the streets and onto the pavements will improve facilities for neither group.

In order for the maps to reflect an active travel network that can truly help achieve behaviour change then routes included need to be of a high standard. We would therefore suggest that where existing routes do not meet a sufficiently high standard this is somehow reflected. This is especially the case where facilities are shared. We welcome the requirement for continuous improvement but would suggest that when creating new routes and links the emphasis must be on delivering to a high standard in the first instance.

Integrated maps could play a positive step towards helping achieve the aims of the Bill. They should also take into account the need to link walking networks with public transport facilities.

We would suggest that there should be a presumption in favour of providing facilities for walking and cycling when creating and improving new roads rather than allowing Authorities to merely have regard. The onus is then on highway authorities to justify their rebuttal and strengthens the position of active travel measures.

3. Have the provisions of the Bill taken account of any response you made to the Welsh Government's consultation on its White Paper?

We welcome the fact that Welsh Government are having regard to the differing needs of walkers and cyclists by determining that walking and cycling routes be mapped separately.

We would hope that this recognition continues through all stages of implementation. Evidence shows that the state of the walking environment is of key importance; Colin Pooley³ indicates that concerns over comfort, ease of use and safety are key barriers to active travel for those not accustomed to both walking and cycling.

Walkers can be subject to the same concerns whilst walking on shared paths as cyclists are when faced with traffic. Fears, whether real or perceived, are reported as preventing active

³ Understanding Walking and Cycling Summary of key findings and recommendations Colin G Pooley
Lancaster University 2011

travel and to accept this on the part of cyclists but to dismiss on the part of walkers is we would suggest counterproductive.

We recognise that current Rights of Way law and definitions are not straight forward but support the view that they need further consideration and therefore come outside the remit of this Bill.

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

Mapping existing and planned networks should enable strategic and linked developments. Strong guidance will ensure that the routes are of a standard that can really support behaviour change. Routes will need to be direct and as pleasant and uninterrupted as possible.

Infrastructure is only one aspect of promoting active travel and then only if it is of sufficient standard. Education and information will be needed to both raise awareness of the facilities available and to break down other identified barriers. There is also a need to address matters such as traffic flow priorities and enforcement of existing traffic laws and to ensure that links with public transport are established.

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

Mapping and developments will need to be of a high standard and without cross departmental buy in there is the danger that active travel will not be prioritised sufficiently for real progress to be made. Current provision is often designed out by engineers with different priorities. There is a lack of political will to increase the space available for active travel with the flow of motor traffic being given priority. Forcing walkers and cyclists together in ever decreasing amounts of space and not tackling car use, parking and public transport links will jeopardise the success of this Bill.

6. What are your views on the financial implications of this Bill?

Investment in active travel produces a good return on investment when the full range of benefits are considered and we would welcome a Bill which supports the type of investment that recognises this true value. We would stress the need to ensure that funds from a wide range of sources be made available to reflect the desired status of the mapped network.

Local Authorities are unable to meet their current statutory duties to maintain the rights of way network some of which will form part of the mapped network. We would not wish to see these scarce resources reallocated as doing so would further endanger the future of our economically, culturally and historically important network.

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 Welsh Ministers?

As referred to above the ability of this Bill to affect real change will rely in the main on the strength of the guidance and the extent to which Authorities are required to implement rather than required to have regard. We already have existing routes that do little to promote active travel as they do not meet the needs of the user. We have routes full of inconsistencies and compromises; designed so as not to take space from nor impede the journey of motor vehicles. If the guidance does not address such things the Bill will struggle to have the impact it could.

Not having sight of guidance renders it difficult to comment on whether the correct balance has been achieved.

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

As noted above we welcome the fact that mapping of walking and cycling routes be considered separately. Too often the effect that the walking environment has on peoples willingness to walk is overlooked in a way that the needs of cyclists is not and this is evidenced in the rhetoric surrounding the Bill and many of the consultation responses.

We feel it necessary to emphasis the importance of bearing in mind the walking experience and the reality that walking, especially when combined with public transport, is an activity that the majority of people can undertake and yet often don't.

Agenda Item 3

Enterprise and Business Committee
Active Travel (Wales) Bill
AT 12 – CTC Cymru



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

CTC Cymru is part of CTC, the national cycling charity, with over 2,000 members across Wales. CTC has 70,000 members and supporters, provides a range of information and legal services to cyclists, organises cycling events, and represents the interests of cyclists and cycling on issues of public policy.

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.

CTC Cymru sees the Bill's provisions as a necessary 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 sufficient support for consistent 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 are likely to be extremely helpful, particularly the requirements placed 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.

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.

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. A stronger duty is therefore 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);

CTC Cymru 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);

CTC Cymru believes this requirement as 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);

CTC Cymru 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)

CTC Cymru 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.”

A stronger duty is therefore 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.

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 – and this has been a theme of amenity organisations responding to the consultation – 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.

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, CTC Cymru 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, or measures to co-ordinate and reinforce 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?

CTC Cymru believes that, apart from the issues we identify under (7.), of implementing design guidance, 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? CTC Cymru 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. But it will need reallocation of Government funding of transport schemes to provide for this.

As representatives of cyclists, CTC Cymru expects to be consulted at all stages of the development of the plans. CTC Cymru would benefit from these proposals if the end result was an improvement in the network of cycle-friendly routes, encouraging a wider range of people to cycle more.

There will be costs in the form of volunteer and staff time involved in contributing the mapping at a local authority level. These efforts will not be worthwhile if the exercise remains a desk-based exercise which fails to result in improvements on the ground.

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?

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, CTC Cymru 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?

CTC Cymru 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 CTC Cymru
22nd March 2013*

Agenda Item 4



Evidence to the Enterprise and Business Committee The Active Travel (Wales) Bill

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.

1. Yes, in our view, there is a need for the Bill. Increases in walking and cycling can provide significant benefits, in particular:

- reductions in car traffic (and associated emissions of greenhouse gases such as carbon dioxide, as well as other pollutants)
- improving people's health & well being (through increases in physical activity and contact with natural heritage; improvements to social cohesion)
- local environmental improvements (where replacing car use: reduces noise and demand for space and improves air quality)
- improved pedestrian and cyclists' safety
- economic benefits (including to local communities adjacent to recreational routes; to those without a car; in the form of lower transport costs)

2. We therefore welcome the commitment of Government to taking forward improvements to walking and cycling networks together with measures aimed at increasing pedestrian and cycling activity. We believe the proposals, if implemented in a sustained way and linked to resources for their implementation, have the potential to achieve significant increases to current levels of walking and cycling.

3. We therefore agree with Welsh Government's rationale and the evidence they have presented in association with the Bill, the Government's consultation paper, the Regulatory Impact Assessment (RIA) and the accompanying statement with the Bill. In particular the evidence presented about:

- the benefits of walking and cycling;
- the barriers to increasing current participation levels;
- that current levels of walking and cycling in Wales are significantly lower than they could be;
- also that attempts to increase overall levels of 'purposeful' walking and cycling amongst the Welsh population in recent years have not been successful

4. We would also note the strong evidence from other countries, notably in Europe, that clearly indicates that if the right approach is taken in this country for a sustained period, significantly increased levels of walking and cycling should be achievable in

Wales in the medium to long term. The factors that have been found to be important to the success of the Dutch¹ in achieving high levels of cycling were:

- A national legal and policy framework
- Interpretation and implementation of the national framework and policies at the local level
- The prioritisation of the needs of cyclists [and non-motorised users] were sustained and implemented over many years
- Integrated transport planning, linked to spatial planning
- Sustained, significant investment
- Provision and maintenance of extensive, good quality cycling networks and associated facilities
- Improvements to safety and the perception of safety
- Traffic education (for motorists and cyclists)
- Wide ranging and positive promotion

5. We therefore agree with Welsh Government that changes are needed to overcome some of the key barriers that exist to walking and cycling in Wales, and that change is possible. We also agree with the areas for change targeted by Government through the proposed legislation. In particular:

- requiring improvements to walking and cycling infrastructure networks and facilities;
- changes to the culture around walking and cycling; and
- the need to inform and support people in making decisions to cycle and/or walk

6. We would also note the role that forthcoming legislation should also consider the ways it can support the Government's aims e.g. the proposed legislation in relation to planning and that for sustainability.

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);

7. We support the idea of providing maps of both existing networks and proposed improvements (integrated networks maps) as part of the duty. We also support the desire not to create an overly bureaucratic process. However, we feel the legislation needs to include other requirements to provide an effective and transparent process

¹ Pucher and Buehler (2007); 2006 review of cycling by Dutch Government's Ministry of Transport, Public Works and Water Management

that will identify and deliver the improvements needed and that engages the public. For example, it is important to assess and consult about the adequacy of the existing network and also the walking and cycling needs of people and visitors to an area. Then, using the conclusions drawn from the assessments and consultations, set out in a 'Statement' to go alongside the maps the strategic aims, objectives and priorities for the network together with the network and route enhancements to be undertaken. This will help engage with the public, better inform the process of identifying the improvements needed and aid transparency as to how the proposed 'list of schemes' was derived. Engagement with the public at this stage will therefore be part of the process of encouraging use of an area's network of routes. (We set out our suggestions in more detail in the attached CCW consultation response to the White Paper, see paragraphs 71 – 78).

8. As noted in our response to Q1 above, we agree with Welsh Government about the need for good information about the route networks available to people and the improvements proposed. Mapped information is one useful approach. We would expect other sources also to be required (perhaps set out in the proposed Guidance) e.g. improved signing of walking and cycling routes on the routes themselves (including destination and distance); provision of information through other media such as information boards, in newspapers, local/regional publicity, mobile technology and so on.

9. We believe that the Bill should include the requirement for local authorities (LAs) to promote their routes and make the information accessible, not just identify and enhance them. This could be done through the provision of measures set out above (for example, signage). We also believe that LAs and other public bodies could be required to advertise how to get to their offices by walking or cycling, for example on their websites.

10. We would wish to see mapping of routes linked to existing mapping duties for 'local surveying authorities' i.e. for unitary authorities' recording of public rights of way (PROW) on definitive maps and statements and for recording of maintainable highways on the 'list of streets' [/ street gazetteer]. We recognise the additional flexibility that the new duty seeks to provide and the avoidance of the legal aspects of the list of streets and definitive map of PROW; nevertheless it is likely to impact on these existing surveying authority duties.

11. We fully support the provision in the Bill requiring the long term planning of improvements to walking and cycling routes. This echoes to some extent the current duties of local authorities to produce Rights of Way Improvement Plans for 10 years – although the ROWIP duty is to cease in 2017. ROWIPs have proved successful in improving the strategic planning and improvement of PROW in Wales. We put forward

the suggestion in our consultation response that the Active Travel should include recreational routes to build on and integrate the good work done through ROWIPs.

12. In relation to the wording in the introduced Bill, in our view it would have been preferable to require the mapping of *networks* for walking and cycling not simply “routes.” Research shows that inter-connectedness of routes is important to people when walking and cycling. Using the existing mapping of PROW, other publically maintained walking and cycling networks (including the road network where appropriate) as the basis of the duty would better integrate management of existing walking and cycling networks for both recreational and more utilitarian purposes. Currently this tends not to be the case.

13. In our view the improvement of walking and cycling routes and networks should be on the basis of the public’s need/demand for route networks rather than solely for ‘purposeful’ journeys. People use many of the same walking and cycling routes and networks for both recreational and utilitarian journeys e.g. Sustrans’ monitoring of the use of the National Cycle Network found that two thirds of all use was recreational compared to utilitarian purposes. Recognising that there is such dual use of walking and cycling route networks the more significant factor in the management of networks should be public need/demand when deciding the priority given to their improvement and management, not whether they are used a recreational or utilitarian purpose (or some combination of the two). It would also avoid separate management of route networks according to whether they are recreational or utilitarian, especially as the benefits realised from their use is irrespective of the purpose they were used for i.e. whether people are using a route to walk the dog or to go to the shops (or indeed both at the same time).

14. In addition, there is evidence (although not particularly extensive) that undertaking recreational walking and cycling encourages people to also walk and cycle for more utilitarian purposes (Cope et al, 2003; Sustrans, 2007²).

15. A duty framed along similar lines to that for Rights of Way Improvement Plans within sections 60-61 of the Countryside and Rights of Way Act 2000 provides a possible model. We would limit the requirement to plan for the improvement of networks of existing public highways (rights of way and other minor highways) and public access to facilitate walking and cycling. We believe such an approach would emphasise the need for a more focused and integrated approach to current duties rather [than increasing those duties] although we would hope as a minimum it would

² Cope et al (2003) ‘The UK National Cycle Network: an assessment of the benefits of a sustainable transport infrastructure’ *World Transport Policy and Practice* 9 (1): 6-17; Sustrans (2007) ‘The National Cycling Network: Route User Monitoring Report 2007’

lead to a shift in existing resources towards implementing walking and cycling network improvements.

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

16. As referred to above in Q1, the key factors in the successful approach to cycling in Holland included:

- integrated transport planning, linked to spatial planning; and
- provision and maintenance of extensive, good quality cycling networks and associated facilities

17. The integration of LTPs with planning for walking and cycling improvements is important and therefore welcomed. However, we think that the requirement ‘...to have regard to...’ should be strengthened so that local authorities are required to take account of such maps in the LTP process; also that the provision should be extended to require authorities to take account of the ‘existing routes [network] map’.

18. In the CCW consultation response to the Bill we suggested that the duty should be part of the LTP duty. We think that such an approach would strengthen the process by formally integrating planning for walking and cycling with other transport planning in Wales. However, we would wish it to be clear that the purposes should include recreational as well as utilitarian use of route networks.

19. To reflect the evidence about the importance of ‘route networks’, we think that the Bill’s terminology should consistently refer to “networks of routes” for walking and cycling e.g. in relation to the 2 types of maps. At the moment one is described as an ‘integrated network map’ and the other as an ‘existing routes map’. This terminology change would help ensure that the importance of walking and cycling networks and their connectivity is consistent on the face of the Bill; it would also need to be followed through in the associated guidance.

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

20. We support the requirement for authorities to make ‘continuous improvement in the range and quality of the active routes and related facilities in their area’. However, for the reasons stated above, in our view the Bill should be consistently worded so as to refer to active travel ‘*route networks*’ for walking and cycling.

21. We would expect the Government to set out in Guidance what is meant by making continuous improvement in the range and quality of the active travel [network of] routes and facilities. We would expect monitoring requirements to be defined in the Guidance and to do so in a way that provides quantifiable measures for improvements to infrastructure and facilities within an authority's area. In addition, to secure the benefits sought by the Welsh Government, authorities should also have to ensure there are increased levels of walking and cycling in their area and this should also be part of the requirement for continuous improvement and its monitoring defined in the Guidance arising from the Bill.

22. If, as we propose above in Q2 (i), the duties also include the requirement for a 'statement' alongside the maps (including aims, objectives, assessed needs, improvement actions etc), the statement could include summaries of the actions proposed along with measurable milestones and a timetable for their implementation.

23. Guidance should set out a requirement to set out specific [quantifiable] targets for improvements and define how monitoring of the progress should be carried out.

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

24. We would wish to see the needs of pedestrians and cyclists assessed as part of a wider process of identifying the improvements that are required in an authority's area.

25. The measure strengthened and extended so that, wherever reasonably practicable to do so, improvements to meet the needs of pedestrians and cyclists are considered when creating and improving new and existing roads and infrastructure. We would also wish to strengthen the provisions to ensure that identified improvements should be implemented [wherever reasonably practicable]. Guidance would be needed to support the implementation of the provision. We believe that paragraph 1d of the Bill therefore needs to be strengthened if the aims of the Bill are to be delivered.

26. While such a broad approach to improving highways may occasionally result in some unconnected walking and cycling facilities in the short term. However, if implemented strategically, over time such improvements will become increasingly joined up (e.g. in the way that improvements to accessibility (such as dropped kerbs) have become ubiquitous following sustained action over several years).

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.

27. As stated above, NRW legacy bodies supported the proposal that the Welsh Government take forward measures to increase walking and cycling through the improved management of routes and networks. We advocated a long term approach to such work and this is reflected in the Bill. We supported and therefore welcome: the mapping of routes; the requirement for LAs to make continuous improvement; the inclusion of measures for WG to ensure the duties are carried out and for them to produce guidance as to how the implementation of the new duties.

28. We support that the wording of the Bill has been amended to remove that requirements for walking and cycling provision to be subject to budgetary requirements, as Environment Agency Wales advised in its response of August 2012.

Regarding matters we advocated that are not within the Bill:

29. The Bill in many cases focuses on 'routes' in its wording. We advocated an approach that focused on networks. Evidence³ strongly indicates that the connectivity of networks for walking and cycling is an important factor in people wanting and being able to use them. The Bill could be more consistent in referring to 'networks of routes' in relation to the measures put forward in the Bill.

30. As referred to above we also proposed that the scope of the Bill should include improving both utilitarian and recreational walking and cycling across Wales. We feel this is important to ensure integrated approaches to the planning and management of walking and cycling (and provision for other non-motorised users where appropriate). This recognises that non-motorised networks are frequently used for recreation and utilitarian purposes and that the benefits being sought can be best achieved through joined up planning and management. It could also allow benefits for non-motorised users other than walkers and cyclists in many places (e.g. horse riders).

31. We also suggested that the approach taken should be based on assessments of the public's needs for walking and cycling (along the lines used for ROWIPs) and that these assessments should be published together with a 'statement' setting out the strategic aims and objectives for the proposed improvements within an area. A map would help to set out such proposals to the public. We also take the view that the Bill would be strengthened if authorities were required to include in such a statement the actions the authority will take for providing information about, and promotion of, walking and cycling in their area [i.e. in addition to the provision of the existing route [networks] map and the integrated networks map].

³ For example: Cyclists and Pedestrians – attitudes to shared-use facilities, CTC (2000)

32. We also suggested that government look to integrate their approach with the LTP [RTP] process by making the duties a defined part of the same process.

33. The provision of information and the promotion of walking and cycling are critical to raising levels of walking and cycling. We suggested therefore that these should be a part of the duties for local authorities.

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

34. See our responses above to Question 3.

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

35. The provision and sustaining of financial and staff resources to carry out the key provisions and to implement improvements will be vital if the Bill is to be a success. In the current financial situation we assume that it will require financial provision to be identified from within existing transport and related funding. However, the scale of resources required for walking and cycling infrastructure and associated soft measures are relatively modest compared to other transport investment⁴. The experience of the statutory ROWIP process is that the requirement to produce the plans was very positively affected by the provision of dedicated funding by the Welsh Government to implement them. The WG's funding has also been vital to LAs' ability to progress with the implementation of the Plans.

36. Co-ordinated effort by local and central government (and its agencies) will be important to support the effective implementation of the Bill's provisions providing a national framework within which local action is taken forward. This framework will need to include ensuring co-ordination with other work areas, notably: road safety (including cycling training), planning, transport, sustainability, health and well-being and recreational access.

37. The application of good practice will be important to ensure that good quality plans are both developed and that they are effectively implemented. Provision in the Bill for statutory guidance, including the proposed design guidance, will provide a

⁴ For example, in CCW's survey of PROW in Wales we estimated that it would take around £8.37 million per year to fully maintain the whole of the 33,000 km network of PROW in Wales [@ 2002 prices] once the network had been improved.

means for WG to steer and support good working practices. Such guidance will also provide opportunities to include measures to support Sustainable Development Schemes and to support habitat management and creation for biodiversity. As well as provision of guidance there will also be a need to ensure that networks for staff training and the dissemination of good practice also support the implementation of improvements.

38. Combining walking and cycling with other transport modes, notably public transport provision, is important in improving the viability of walking and cycling as practical travel options. Integration of planning for both is envisaged within the Bill but, as explained above, could be strengthened in our view.

39. Planning related matters affect the feasibility of providing for journeys on foot and by bike both in terms of requiring walking and cycling facilities to be provided and in terms of the journeys people need to make.

40. The long term vision set out in the Bill is vital to bring about change. This consistent, incremental approach to providing for walkers and cyclists over the long term is widely noted as a key factor in the higher levels of walking and cycling in a number of European countries.

41. There should also be consideration to providing information about how much money individuals and councils could save through more active travel, rather than just focus how much the duty will cost to implement. This could take into account the economic benefits of health, environmental and wellbeing improvements that would arise as a result of increased active travel.

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.

42. We already incorporate footpaths and cycle ways into our flood defences wherever practicable. In some cases such provision is not appropriate or feasible. As there is no duty in the Bill for NRW to make such provision, it appears there are therefore no obligatory costs to NRW arising from the Bill.

43. However, as we raised in Environment Agency Wales' response in August 2012, we seek reassurance that the proposed duty will not inhibit our (and Local Authorities') abilities to carry our flood risk and coastal erosion management duties, and that there should not be any future requirement for Local Authorities (or other organisations) to install walking and/or cycling routes along flood defences. Often,

routes will be appropriate, but we would seek to ensure they do not compromise the integrity of the structure or NRW's ability to access and maintain the flood defence structure. Routes would also have to be designed with Health and Safety in mind. We would seek clarity on who is liable if someone has a travel/recreation related accident on a path atop our defence. If appropriate, we would request that such matters be covered in the proposed guidance (as referred to in Section 9 of the Bill).

44. We also believe that there may be opportunities for us to work with LAs, as they design their route maps, to maximise the potential of features such as rivers and flood defences as travel routes. Again, we believe this could be done via the proposed guidance.

45. As well as routes on flood defences, NRW will also seek to ensure that access provision within the WG Woodland Estate supports existing active travel networks/routes and local authorities' plans for walking and cycling improvements where appropriate. We believe there will be opportunities to contribute to such improvements as part of our day to day management of access on the Woodland Estate. However, there is limited capacity and resources at this time to meet demands for new route provision or improvement of existing routes on NRW land other than those already planned.

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?

46. We support the Government's approach to provide a statutory framework using primary legislation with additional provision through statutory and non-statutory guidance.

47. We consider that enhancing walking and cycling routes present the opportunity to deliver multiple benefits, such as for: society, people's health and well being, the economy, green infrastructure, habitat creation, sustainable drainage systems and traffic calming. We do not believe that this needs to be included in the wording of the Bill itself. However, we advise that it be included in the supporting guidance.

48. In addition we would expect other policies and programmes to be co-ordinated in support of the work. Development of a programme and associated processes to co-ordinate the range of work that needs to be taken forward would help to support wider implementation.

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

49. As part of an integrated approach to natural resource management, there is an opportunity when informing people about walking and cycling route networks, and alongside the routes themselves, to connect people with their local environment through the provision of information about its history, landscape, cultural and natural heritage.

50. The proposals in the Bill will also benefit our activities as an employer supporting active travel to and within work. As an employer we have found a provision led approach (e.g. providing showers, secure bike storage and changing facilities) has been successful in increasing walking and cycling levels amongst employees of NRW. (Improving facilities at train and bus stations and park and ride facilities may be similarly beneficial.)

51. We have found that the location of offices close to urban centres and public transport has also significantly affected the levels of walking and cycling amongst employees. Centrally located offices have higher levels of walking and cycling compared to our out of town locations.

52. To provide a supportive culture NRW have (amongst other things) set up Bike User Groups, have folding bikes available to staff to use to travel to meetings, operated 'Cycle to Work' schemes and promoted cycling and walking to work as part of Green Transport Week. Such actions go some way to demonstrate what measures can help encourage behaviour changes and to encourage a culture of active travel.

53. We would welcome the opportunity to make comments on the route networks and Guidance that will arise from the implementation of the Bill.

18 April 2013