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15 March 2013

CONSULTATION ON ACTIVE TRAVEL (WALES) BILL

National Assembly for Wales Consultation Paper

British Medical Association Cymru/Wales

INTRODUCTION

BMA Cymru Wales is pleased to provide a response to the consultation by the National Assembly for Wales' Enterprise and Business Committee on the Active Travel (Wales) Bill.

The British Medical Association represents doctors from all branches of medicine all over the UK; and has a total membership of over 150,000 including more than 3,000 members overseas and over 19,000 medical student members.

The BMA is the largest voluntary professional association of doctors in the UK, which speaks for doctors at home and abroad. It is also an independent trade union.

BMA Cymru Wales represents some 7,000 members in Wales from every branch of the medical profession.

RESPONSE

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.

BMA Cymru Wales fully reiterates its support for the intentions of this Bill. We believe that from a health perspective, there is very much a need for a Bill aimed at enabling more people to walk and cycle, and to generally travel by non-motorised transport. We believe there are huge benefits to be obtained to the health of the people of Wales by developing a sustainable transport environment where active travel and public forms of transport represent realistic, efficient and safe alternatives to travelling by car.

Currently there is significant year on year population growth in Wales' major cities (Cardiff – over 3,400 each year since 2001¹; Swansea – average annual growth of approximately 1,000 people, +0.45%, each year since 2001)². This means that to do nothing with regard to planning for future travel is not an option.

Within Cardiff alone the future need for jobs (40,000 new jobs) and homes (45,400 new dwellings) to support that population growth means that sustainable transportation solutions need to be supported.¹

The Cardiff Local Development Plan 2012 states:

“...Sustainable transportation solutions – Responding to the challenges associated with new development by setting out an approach aimed at minimising car travel, maximising access by

¹ Cardiff Local Development Plan 2006-2026 <http://www.cardiff.gov.uk/>

² Swansea Local Development Plan <http://www.swansea.gov.uk/>

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sustainable transportation and improving connectivity between Cardiff and the wider region. This can be achieved by making the best use of the current network, reducing demand where possible and widening travel choices. The aim is to secure a modal split of 50% car and 50% non-car modes..."

To make an effective, lasting and useful change, transport planners have to understand the cycling versus walking 'journey'. These are very different journeys which need to be assessed and met differently.

Cycling is generally used in two different modes: repeated or a succession of short journeys for delivery of goods or services over distances up to about four miles; and for regular but single journeys over more than half a mile but less than eight miles.

Walking tends to be restricted to distances of less than a mile. (20 minutes appears to be the critical time limit.)

Commuting can be undertaken in a mixture of modes of transport – for example a 15 minute cycle ride to a train station where a cycle might be placed in secure storage, followed by a train journey and another 15 minute walk to the destination.

Successful commuting by bicycle needs to be timely, safe, easy-to-use and applicable to all. Facilities for cycling also need to be more joined-up, for instance by avoiding breaks in cycle paths which force riders into congested traffic for sections of their route. Unless cycle commuting is a simple and straightforward process which can be maintained year round, it is not likely to be sustained as a travel choice.

Evidence

There is a significant and increasing worldwide body of evidence demonstrating the economic, social and health benefits associated with active travel; a workforce that cycles to work; and families who use active travel as one of their major forms of transport.

Health

A Californian study of 24 US cities compared cities with high, medium and low use of bicycles for routine transportation (as a marker of active transport). It showed that traffic fatality rates fell as active travel rose (high biking cities averaged 2.5 fatalities per year per 100,000 residents compared to almost 9 deaths per year per 100,000 residents for the low biking cities). The decrease in fatality in high biking cities occurred for all classes of road users, including people in cars, and not just for people on bikes and on foot. In other words, an increase in active travel was shown to benefit all road users by helping transform streets into safer places. By contrast, all classes of road users were at greater risk of fatality in the low biking cities.³

Personal benefits include those that follow from the social interaction mentioned below, but also from the well-being elements that regular gentle exercise creates – including improved mental alertness, decreased obesity⁴ (and illnesses associated with obesity) and improved cardiovascular and respiratory reserve.

An element that is often overlooked is the benefit of walking if it takes place in a green environment, in reducing blood pressure and improving antimicrobial resistance (by enhancing mood and white cell activity). It is not clear how these effects work, but they are comparable to the effectiveness of many therapeutic agents the NHS currently spends millions providing.⁵

³ Norman Garrick and Wes Marshall (2011) <http://www.planetizen.com/node/50020>

⁴ Russell P Lopez and H Patricia Hynes. Obesity, physical activity, and the urban environment: public health research needs. Environmental Health: A Global Access Science Source. Vol 5, p25, 2006.

⁵ Green spaces (2009) <http://news.bbc.co.uk/1/hi/health/8307024.stm>

Economic

A detailed 2012 review by the London School of Economics found that regular cyclists take on average 1.3 less sick-days per year, which saves the UK economy £128 million per year in reduced absenteeism. Over a 10-year period the net present value of such cost savings to the economy could rise to £1.6 billion. A 20 per cent rise in cyclists by 2015 could save a stretched NHS £52 million in costs.⁶

It costs less to build and maintain infrastructure that relies principally on mass transit for medium to long distances, with active transport for distances up to about 5 miles.

The reduced demand for hard surfaces also reduces drainage and heating/cooling costs in urban areas, as well as flood risks.

Increased active travel will reduce CO₂ emissions and improve air quality. The main source of emissions currently affecting air quality is road traffic, with nitrogen oxide being the main pollutant.¹

There is evidence that streets in which cycling and walking are prioritised lead to a positive impact on the health/economy of local businesses, as cyclists and pedestrians then spend more per capita locally.^{7,8}

People-friendly areas are pedestrian- and bicycle-friendly areas, which welcome and attract tourists and bring increased profit to a local economy.⁸

Social

Active transport helps build communities by ensuring there are observers in all areas. This reduces crime rates and increases social inclusion. For this reason Swansea Council has set up a Public Transport Enquiry Panel with the purpose of look at how public transport can help to improve levels of social inclusion across different communities and groups in Swansea.²

A 20% increase in current cycling levels by 2015 could save the UK economy £207 million in terms of reduced traffic congestion and £71 million in terms of lower pollution levels.⁶

Crime and Disorder

There appears to be a link between reduced crime and degrees of active travel. This may be linked to the social benefits given above, or it may be due to the greening effect of active travel. This was demonstrated in Chicago, where a study of 98 vegetated and un-vegetated apartment buildings showed that vegetated spaces cut crime by half, in addition to inspiring pride for surroundings that translated into less litter and less graffiti.⁹

Cardiff's LDP Vision as set out in the 10 year, 'What Matters' Strategy (2010-2020) is that:

"By 2020... Cardiff will be a world class European capital city with an exceptional quality of life and at the heart of a thriving city-region.

⁶ Grous A (2012) <http://www2.lse.ac.uk/newsAndMedia/news/archives/2011/08/cycling.aspx>

⁷ Clifton K (2012) <http://bikeportland.org/2012/07/06/study-shows-biking-customers-spend-more-74357>

⁸ Economides A (2012) <http://www.transportationissuesdaily.com/nine-reasons-to-create-a-bicycle-friendly-business-district/>

⁹ Dr. Susan Barton (2008) Human Benefits of Green Spaces
http://ag.udel.edu/udbg/sl/humanwellness/Human_Benefits.pdf

- *People in Cardiff are healthy;*
- *People in Cardiff have a clean, attractive and sustainable environment;*
- *People in Cardiff are safe and feel safe;*
- *Cardiff has a thriving and prosperous economy;*
- *People in Cardiff achieve their full potential;*
- *Cardiff is a great place to live, work and play; and*
- *Cardiff is a fair, just and inclusive society”*

From the evidence given, it can be seen that increasing active travel throughout Wales, and in its capital Cardiff, will significantly help achieve each of the above seven domains. However, to ensure they are met there has to be the ‘political will’ – with accountability, resolve and ‘teeth’. There has to be a social change – a move away from the culture of ‘car convenience’ and towards ‘normalising’ active travel. Potential active travellers need to feel that it is ‘just as easy to walk or take the bike, depending on the journey, as it is to take the car’. Currently this is not the case.

Within the UK, some 3 million people live in areas with 20 mph speed limits. The experience of this shows that not only do slower speeds save lives, but lowering the limit to 20 mph improves the way local streets function. The change has produced wide-ranging benefits – including less traffic; increased walking and cycling; greater independence for children, the elderly and infirm; better health; and calmer driving conditions for motorists.¹⁰

Until a balance of normalising active travel exists, the default for the population will be to take the car. This needs to be addressed and, for that reason and those outlined above, BMA Cymru Wales fully supports the aims of the proposed Bill.

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);**

BMA Cymru Wales fully supports the requirement on local authorities to prepare and publish maps identifying current routes for the use of pedestrians and cyclists and of related facilities. As well as providing useful information to provide people with the opportunity to make appropriate active travel choices, it will also provide a useful appraisal of what the current situation is and where it is lacking in provision for both cyclists and pedestrians. This in itself will help Welsh Government and local authorities to focus on what needs to be done to provide the level of improvement that is required.

The only concern we would have with this requirement is that we would have to wait three years for the first of these maps to be produced. We note that it has been estimated in the regulatory appraisal that such maps can be produced in a considerably shorter time period than three years. We therefore believe that the initial maps should be produced within a shorter time-frame than that which has been proposed.

The requirement on local authorities to prepare and publish maps identifying potential future routes for the use of pedestrians and cyclists and related facilities every three years is also welcomed and supported. Again, thought, we have concerns that we would have wait three years from the Bill coming into effect for the first such maps to be produced. We would like to see improvements coming into effect more quickly and suggest that the time-frame for the initial set of maps to be produced should be shortened.

We welcome the proposed requirement that the maps will need to be approved by Welsh Ministers but we believe more detail needs to be given of the expectation of Welsh Ministers on the level of improvement that will be required in each three-year period following the production of each set of maps.

¹⁰ <http://www.streetfilms.org/no-need-for-speed-20s-plenty-for-us/>

We also have concerns regarding how effective each map will be in delivering improvements in each local authority area unless the estimated costs of introducing the proposed future routes and related facilities outlined within each map are also required to be calculated at the same time. There should be a requirement for an estimate of the affordability of such proposed future routes to be considered to avoid the possibility that the maps merely constitute unrealistic and unaffordable wish lists. These maps will in effect become rolling lists of proposed improvements updated every three years, but unless there is some thought as to how much of what is proposed can realistically be delivered in each three-year period between the production of each set of maps, then there is a risk that we would not see a sufficient level of enhancement in the provision of active travel routes and related facilities compared to the current situation.

The remit of proposed guidance to be issued by Welsh Ministers should therefore be broadened to cover the need for the affordability and deliverability of proposed improvements in each three-year period to be assessed. We believe this will be required in order to ensure sufficient levels of improvement are proposed within the maps, in a manner which is both affordable and deliverable.

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

We support this requirement, but have some concerns that it may in itself be too vague to be useful. Requiring local authorities to merely have regard to the integrated network map when forming a local transport plan provides no guarantee whatsoever, that any of the proposed future routes for cyclists and pedestrians will actually be incorporated within it. This requirement should therefore be strengthened to make the provision of active travel routes and related facilities as outlined in a local authority's integrated network map a priority within its local transport plan, with this being matched by a suitable allocation of resources to ensure that measures to promote active travel are actually delivered.

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

BMA Cymru Wales fully supports the principle of this requirement. However, as the Bill is currently drafted, we are concerned that the wording is similarly too vague. We are concerned that it will not provide any guarantee as to the extent to which improvements will be delivered. We believe there needs to be a dramatic increase in the provision of improved facilities for pedestrians and cyclists and are concerned the wording of this requirement is not strong enough to ensure this will happen. Much will depend on what is laid out in an accompanying guidance from Welsh Ministers and it is difficult to fully judge the benefit of this without having some idea of what such guidance will require. We believe that this requirement should therefore be strengthened, including through the agreement of appropriate minima.

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

This principle of this requirement is very much welcomed as it is something which is all too often overlooked at present. However, we also believe the requirement needs to be strengthened as merely requiring Welsh Ministers and local authorities to have regard to the desirability of enhancing the provision for walkers and cyclists will not necessarily ensure that such enhanced provision is actually delivered. We believe the Bill needs to include a significantly more robust requirement that would ensure improvements for pedestrians and cyclists are prioritised in built-up 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.

The Bill as drafted supports the broad aims of what we have previously called for in response to the Welsh Government's consultation on its White Paper, but there are a number of specific proposals for which we have previously called that have not been incorporated. These include:

- The need for the provision of dedicated and appropriate funding for new and enhanced active travel routes and related facilities.
- A specific requirement that maps of proposed enhancements should give consideration to longer routes, where public transport may form part of a journey. For instance, we called for safe secure areas where cyclists can leave their bicycles, such as at stations, before then continuing on a journey by public transport.
- A requirement that no new road schemes should be built without exploring the incorporation of provision for cyclists and pedestrians, with good reason having to be given if such provision is not to be made.
- A duty to make all trunk, A and B roads in urban areas safe for cycling on the carriageway.
- Avoiding the provision of off-road routes intended to be shared by pedestrians and cyclists in urban areas, as this places cyclists, pedestrians and dogs in conflict.
- Avoiding addressing safety concerns by simply imposing a ban on cycling, or providing sections of legalised pavement cycling, instead of designing (or re-designing) a road to give priority to walking cycling and public transport from within the same proposed budget.
- Placing a duty on local authorities to devise a plan to prioritise walking, cycling and public transport on existing and new main roads.
- Placing a duty on local authorities to reverse the rise in motor vehicle traffic in their area, and increase the percentage of journeys undertaken by foot, cycle and public transport.
- Agreeing regulations/standards on effective measures to achieve improved active travel routes, which might include such things as:
 - 20 mph speed limits in all urban areas
 - road layouts which prioritise cycling and walking
 - home zones
 - standard crossings at all main road junctions with no intra-urban roundabouts
 - active traffic management to keep through-traffic away from residential neighbourhoods
- Requiring consultation with Public Health Wales (PHW) and local health boards (LHBs) with regards to new statutory plans for prioritising walking and cycling along existing transport corridors.
- Requiring local authority officers involved in transport planning, policy and design to be professionally qualified in integrated sustainable transport methods, and for local authorities to provide adequate on-going training in this regard.

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

The key provisions certainly take the agenda forward in the right direction and this is to be welcomed. However, as we have already outlined, we believe the provisions in the Bill need to be strengthened in a number of areas and broadened in scope. We believe this is necessary in order to provide a more effective regulatory framework that will guarantee the delivery of the required step change in improvements that is needed to effectively promote and encourage active travel.

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

The main barrier to the implementation of the key provisions in the Bill is the lack of sufficient accompanying detail as to how the desired improvements in the provision of active travel routes and related facilities will be financed. There needs to be a stronger and clearer commitment to making available appropriate and dedicated funding, or at least to ensure that a sufficient percentage of existing transport expenditure by Welsh Government and local authorities is used for the provision of improved or new active travel routes, and related facilities. This could for instance involve requirements for Welsh Government and local authorities to prioritise the promotion of active travel routes and related facilities within any allocation of resources for transportation improvements, or a requirement that a certain percentage of the overall funding spent on transportation improvements needs to be directed to providing new or enhanced facilities designed to further the aims of the Bill.

We very much welcome the stated intention by Welsh Government to review funding streams from the Welsh Government Transport department to support the aims of the Bill, but believe this commitment needs to be elaborated upon in greater detail to provide the necessary level of confidence that this will be sufficient to ensure effective delivery of the Bill's stated aims. We also believe there should be a similar commitment derived from Welsh local authorities to also realign transport expenditure where necessary to promote improvements in the provision of active travel routes and related facilities.

We believe there needs to be a stronger requirement with regards to the extent that new and enhanced travel routes and related facilities are provided in each three-year period following the production of integrated network maps. Without a system by which appropriate targets are set and monitored, the intentions of this Bill may not be effectively realised.

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 focuses primarily on the revenue costs of producing and updating maps but does not provide sufficient information as to the likely costs of implementing the improvements in infrastructure that will be required. We believe this is an area which requires more work to ensure that effective proposals to improve active travel routes and related facilities can be delivered to the desired level, and that any necessary shift in resources away from the provision of other transport expenditure can be effectively planned for by Welsh Government and local authorities.

We very much welcome the recognition within the Explanatory Memorandum that the greater promotion of active travel and provision of appropriate facilities could lead to cost savings to the NHS over a 20 year period of between £125 million and £517 million. We consider this to be a strong driver in support of the implementation of this Bill.

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?

In line with concerns we have already expressed, we believe that some desired commitments may need to be more explicit within the Bill itself and this may be best achieved by increasing the level of detailed provided on the face of the Bill.

The success of this Bill, as it is currently written, will be dependent on the extent of commitments and requirements provided by Welsh Ministers and/or placed upon local authorities in accompanying regulations and guidance. Without effective accompanying commitments, and without the provision of appropriately directed finance, this Bill could potentially fail to deliver against expectations.

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

We would merely reiterate that we fully support the aims and intentions of this Bill, but we believe it needs to be strengthened in a number of areas as we have already outlined in this response. Without such changes, we are concerned it might regrettably represent a missed opportunity for Wales to lead the UK to a healthier future at lower cost.

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