

1. Objectives of the Active Travel Act

- 1.1. Cardiff Council fully supports the objectives of the Active Travel Act. We have developed an ambitious vision for active travel in our city, including our emerging Cycling Strategy which aims to develop Cardiff into a cycling city where cycling is a normal, practical and safe choice for short trips for people of all ages and abilities and to double the number of cycle trips in the city by 2026.
- 1.2. The development of this vision is fully integrated with the development of our Integrated Network Map, which sets out proposals for a network of Cycle Superhighways, performing the function of “Primary Routes” as set out in the Design Guidance, which aim to deliver a step change in provision for cycling and provide an exemplar for the quality of cycle facilities needed to achieve significant mode shift for everyday journeys. However, it is clear that while the Active Travel Act has delivered a framework for planning active travel networks and useful guidance for the development of good quality facilities, a step change in funding will be required to deliver the schemes set out within our INM and realise our vision for active travel.

2. The Effectiveness of the Guidance

- 2.1. On the whole, the Active Travel Design Guidance is a useful guidance document for the creation of good quality active travel routes which incorporates many elements of best practice for active travel infrastructure design.
- 2.2. At present, the Active Travel Design Guidance is mainly of interest to Local Authority officers with responsibility for ensuring that the Local Authority meets its duties under the Active Travel Act. However, in order to get buy in for the principles of active travel design as set out in the Design Guidance and ensure its application beyond the somewhat narrower scope of Active Travel Act duties on Local Authorities, it is important that the Design Guidance is more widely promoted across all sectors, both public and private. Welsh Government should work with professional institutions (e.g. RTPI, ICE) to better promote the role of the Guidance and the wider objectives of the Act. We would welcome a programme of training and workshops to develop active travel design skills.
- 2.3. There is a clear need for some good quality schemes to be created as exemplars for the implementation of the Design Guidance which can be used to promote the Design Guidance and raise its profile. For example, the guidance is quite clear that shared use routes in the urban environment should be considered as a last resort, however there are very few existing examples of good quality segregated cycle routes in the urban environment in Wales.
- 2.4. There is an apparent disconnect between the design standards, as set out in the body of the Design Guidance and the Design Elements in Appendix A, and the Walking Route Audit Tool and the Cycling Route Audit Tool which must be used for the assessment of active travel routes under the

requirements of the Act. For example, Table 6.2 in the Design Guidance sets out recommendations as to where segregation from motor vehicles is required, with on-road cycling considered appropriate for 20mph streets with daily vehicle flows less than 2000 for primary routes and 5000 for secondary routes. However, the “critical fail” threshold within the Audit Tool is at 10000 vehicles per day or 85th percentile speeds in excess of 37mph. The margin between conditions set out in Table 6.2 and those considered a “critical fail” within the Audit Tool represents a significant drop in quality of provision for active travel routes and in practice it is difficult to defend the designation of on-road active travel routes where conditions exceed those set out in Table 6.2.

2.5. The format of the Audit Tools should be revised to achieve a better fit with the Design Guidance as a whole. Cardiff Council would welcome the opportunity to provide further input on the revision of the Audit Tools.

3. Actions to improve the effectiveness of the Act and its implementation

3.1. The Active Travel Act and accompanying Guidance provides the framework to do things differently in planning, designing and delivering active travel routes. This requires taking different approaches to common practice in Wales over recent years and, at times, implementing innovative solutions. To support these new ways of delivering active travel routes, it is important that Welsh Government supports local authorities to deliver pilot projects to trial new and innovative infrastructure for active travel, to award best practice in active travel provision, and to provide incentives in order to promote excellence in the delivery of new infrastructure for active travel.

3.2. The development of the ERM and the INM took a significant amount of time to complete. In total, the ERM development work took approximately 10 months and the INM development work took 20 months. Given the requirement of the Active Travel Act to resubmit the ERM and INM every 3 years, it would be helpful at this stage if the Delivery Guidance is reviewed with a view to streamline the process for revising the ERM and INM to ensure that the process does not become onerous or divert resources away from implementing the schemes set out in the INM. Consideration should also be given to mechanisms to make simple updates to the INM in a timely way, for example where an update may be required to address a local issue.

3.3. Cardiff Council has agreed to work with local active travel advocacy groups in the city to produce an early update of Cardiff’s INM. This work will focus on developing a set of principles and a methodology for the future development of the ‘basic network’ of routes connecting to the main route corridors. We would look to trial the implementation of this approach in conjunction with the delivery of the early phases of the Cycle Superhighways featured in the INM.

3.4. As has been the case with our development of the INM, this will be an iterative process where we will work closely with local groups and communities and seek their input to inform proposals. This will ensure that infrastructure meets the needs of all users. The outputs of this work will be

captured within an updated INM. As stated in paragraph 3.2 above, it is important that the process for updating the INM can be done easily and quickly, so as not to divert resources away from delivery.

4. Funding and capacity to support the implementation of the Act and wider active travel policy

4.1. Compared to major highway infrastructure schemes, active travel schemes are relatively low cost and offer high value for money. Nevertheless, in order to achieve the step change in quality of provision required to meet the objectives of the Active Travel Act it is necessary to secure a step change in the funding available for scheme delivery. Cardiff Council annual spend on new active travel routes and improvements to existing travel routes is currently around £3.5m. The estimated cost of implementing a network of 5 Cycle Superhighway routes is £40-50m, which at current levels of funding would take 15 years to deliver, without taking account of funding required to improve the secondary cycle routes and walking route networks set out in the INM.

5. Integration in wider Welsh Government and local government policy

5.1. It is important that Welsh Government is seen to be taking the lead in the implementation of active travel facilities by ensuring that Welsh Government infrastructure schemes are exemplary in design for active travel, providing tangible, practical examples of good quality infrastructure that champion the objectives of the Active Travel Act and promote the use of the Design Guidance.

5.2. The statutory duties on Local Authorities under the Active Travel Act do not sufficiently extend to other functions undertaken by Local Authorities, for example Planning and Education, to the extent that delivering and maintaining active travel routes in relation to new development can be frustrated.

5.3. The Active Travel Act itself does not specifically refer to the role of the planning system in the fulfilment of the duties imposed on Local Authorities by the Act. In order to ensure that the objectives of the Active Travel Act are integrated into the Welsh Planning System it is therefore necessary to revise Welsh planning policy. Approval of new developments located within, or extending to, the boundary of defined Built Up Areas (BUAs) must be dependent on the provision of safe and attractive routes for active travel.

5.4. The 21st Century Schools programme also illustrates a funding and policy gap. To date there appears to have been no specific requirement for new school projects funded through the programme to be integrated and connected with local active travel networks. Consequently, construction of new schools has focused on development within the site boundary and school gate measures only, with limited funding available for off-site improvements for active travel. This contributes to the existing pattern of piecemeal provision of active travel facilities and places the burden of planning and funding functional routes to schools within the Local

Authorities transport functions, where resources are already limited as set out in paragraph 4.1.

5.5. To ensure consistency across key legislation related to sustainable development in Wales, reference to the Active Travel Act should be incorporated within the Statutory Guidance for the Well-being of Future Generations (Wales) Act 2015 and reference to the Well-being of Future Generations Act should be included within the Statutory Guidance for the Active Travel Act.

Cardiff Council

7th February 2018