

Kathryn Thomas
Deputy Committee Clerk
Legislation Office
National Assembly for Wales
Cardiff Bay
CF99 1NA

19 March 2013

Dear Kathryn,

Written evidence to Enterprise & Business Committee on Active Travel (Wales) Bill

As requested, please find below a written submission to the Enterprise and Business Committee from Sustrans, ahead of our oral evidence session on Wednesday 20 March.

Sustrans believes that the Active Travel (Wales) Bill has the potential to be the most effective public health intervention in Wales since the introduction of the smoking ban. The evidence shows that the easiest way for most people to get more exercise is to build it into their daily routine, but even though most everyday journeys are short, many of us still choose to take the car – in fact 20% of our car journeys are less than 1 mile.

The key provisions in the Bill go some way towards delivering the culture change necessary and we have set out our response in answer to the questions suggested in the consultation letter.

Regards,

Lee

Lee Waters
National Director, Sustrans Cymru

123 Bute Street
Cardiff
CF10 5AE

029 20 650 602

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 Six years ago Sustrans submitted a widely supported petition to the National Assembly calling for a legal duty on highways authorities to develop and maintain a network of routes for walking and cycling.

1.2 We did so because we identified a series of systemic blockages from developing a culture of active travel in Wales. We believe a duty to develop provision for walking and cycling is an important symbolic statement to Highways Authorities in Wales that their remit is not simply to provide roads for cars, but to provide for people to travel on foot or by bike too.

1.3 One of the initial barriers to making this a reality we identified was the availability of funding to maintain paths. When a Highways Authority creates a road there is funding available to maintain their asset. When a traffic free path is created there is no on-going maintenance funding available and authorities are in effect creating a maintenance liability for which they have no easy way of maintaining. As a result many of the small authorities refused to build anything on the basis that they couldn't afford to look after it. By redefining the traditional remit of Highway Authorities we wanted to remedy that problem.

1.4 A further barrier to increasing usage is the quality of the infrastructure that is provided, and the extent of the existing network. It is not uncommon for 'cycle routes' to start and stop randomly, and not connect people with the places they want to go. This is arguably a result of active travel not being taken seriously by Highway Authorities.

1.5 The current approach often results in road design standards applied to the development of walking and cycling routes. Furthermore local authority engineers will often apply different standards to schemes with different stated aims, for example, a 'road safety' scheme will be treated differently to a 'cycling scheme'. This is one of the reasons why users encounter sometimes bizarre design details which frequently bring investment into 'cycle schemes' into disrepute.

1.6 While this may seem like an opaque issue it goes to the heart of what we are trying to achieve: getting people who currently do not travel in physically active ways to do so. The lack of a 'user focus' to the design of routes means that infrastructure is often off putting to new or novice cyclists. Unless the detail of a route is sympathetic to a new user it will be unlikely to attract new people to use it. Attempts to remedy this through voluntary guidance have not resulted in a shift in professional practice and therefore best practice design standards underpinned by law is, in our view, the best way forward.

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 Preparing and publishing maps will play an important role, helping Local Authorities across Wales understand the network that currently exists. Crucially, it will also draw attention to the gaps in the network that, if completed, could enable an increased number of local journeys to be made actively. If the integrated network map is fully consulted on and comprehensive, it will ensure that future funding for active travel is spent in a more strategic way and in-turn offer better value.

2.2 For new walking and cycling routes to achieve their full potential, it is essential that local authorities take into account the need to raise awareness of new routes. Our research has shown that lack of information is the greatest subjective barrier to increasing use of sustainable transport. Most people simply do not know the times of the buses from their nearest bus stop, nor do they know where the nearest safe cycle route is or where it connects to. This in-turn impacts their perceptions of the amount of time it takes to travel other than by car. For

example, people perceive door-to-door journey times by car relative to public transport to be around twice as quick as they really are. Similarly, door-to-door journeys within towns are often quickest by bicycle, but this is not the common perception.

2.3 The provision of maps, therefore, is an important step in tackling one of the barriers to behaviour change. Evidence from the Welsh Government funded Personalised Travel Planning (PTP) project in Cardiff and Penarth has shown that simply providing people with tailored information for their regular journeys can have a major impact on levels of active travel. The interim project report from north Cardiff shows an 8% fall in single-occupancy car journeys and a trebling of cycling levels from 1% to 3% of all journeys (an increase of 196%). And it is noteworthy that the most commonly requested item was a local map.

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

2.4 Until this coming financial year (2013/14) there has been no requirement on the Regional Transport Consortia to develop walking and cycling schemes. In anticipation of the Bill that has now changed, with the introduction of ring-fenced funding for active travel capital schemes.

2.5 The development of integrated network maps will help ensure that existing efforts to encourage greater levels of active travel are exercised more strategically. It is not uncommon for projects to be provided with grant funding within a single financial year, or for funding to be provided relatively late in the year as part of under-spend arrangements. This can lead to money being spent inefficiently and infrastructure designed around delivery constraints rather than best practice. Through ensuring that each local authority in Wales has a prioritised list of schemes that have been identified as having the potential to encourage more people to walk or cycle, this Bill has the potential to ensure existing transport investment is spent to greatest strategic effect.

2.6 Integrated network maps should play a crucial role in informing future local transport planning, highlighting key areas where improvements and additions to the active travel network could lead to an increase in regular journeys being made by an active method. The duty to have regard to the integrated network maps should also have the impact of mainstreaming walking and cycling with local authority transport departments.

2.7 The Bill requires authorities to take into account ‘the location, nature and condition’ of a route when determining the most appropriate. We believe the criteria should be widened to create routes that are “continuous, direct, safe and comfortable for walking and cycling”. If we want long term culture change then we need to make active travel options more attractive, pleasant and convenient than using a car for short journeys. As the landmark Making Cycling Irresistible study notes, *“The bicycling networks in.. [Amsterdam, Groningen, Copenhagen, Odense, Berlin and Muenster] include numerous off-street short-cut connections for cyclists between streets and traversing city blocks to enable them to take the most direct possible route from origin to destination. The result of such a wide range of facilities is a complete, integrated system of bicycling routes that permit cyclists to cover almost any trip either on completely separate paths and lanes or on lightly traveled traffic-calmed residential streets.”* (Pucher & Buehler, 2008 Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany)

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

2.8 Continuous improvement will be vital in ensuring that an increasing number of people living in Wales are able to benefit from safe walking and cycling routes. However, the Bill’s provisions are not clear on what will be regarded as ‘continuous improvement’. While the intention may be to create new routes over time, simply removing barriers, general maintenance and resurfacing could all be considered to be improvements. While the Bill states the need for local authorities improve the “range and quality of their routes”, the Explanatory Notes in Annex One (paragraph 20) uses the phrase “either by expanding the amount that is available or by upgrading existing provision.”

2.9 Sustrans believes that a stronger reference to achieving the network compiled in the integrated network map will be crucial. Indeed, the accompanying Explanatory Memorandum states that the second map *“is intended to be a visual representation of the local authorities’ plans for active travel over a 15 year period”*. This aim should be reflected on the face of the Bill, and further clarity is needed in the accompanying documents.

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

2.10 It is arguable that highway authorities already must ‘have regard to the desirability of enhancing the provisions made for walking and cycling’ via the WelTag appraisal tool – yet still too many new roads are built without facilities for pedestrians or cyclists.

2.11 Sustrans has long called for a re-appraisal of the WelTag system, which is biased towards road transport, and we raised this in our response to the White Paper on the Bill. Assuming the WelTag appraisal is not altered, it is therefore not clear what practical difference the provision in the Bill will make.

2.12 The Minister’s oral evidence to the committee implied that the duty in the Bill would over-ride WelTAG but we would welcome clarity on this point.

2.13 The Explanatory Memorandum states that *“At present, active travel is now always given serious consideration as a mode of transport”*. However, WelTAG current disadvantages schemes that promote physical activity. For example, although improved health and well-being can be included as a benefit, the range of health benefits that can be included is small. There is no way of valuing the health benefits of walking, for example, and all of the benefits are related to ill-health that you would associate with old age, rather than chronic illness, such as type II diabetes, that is increasingly associated with physical inactivity in children and young adults. Conversely any scheme that reduces levels of physical activity by, for example, encouraging people to drive short distances, or creating an environment that discourages walking and cycling, does not have this counted as a cost. Similarly, there is still no guidance from transport departments on how to appraise smarter choices initiatives and capture the benefits within WelTAG. As a consequence, smarter choices or active travel options tend to be dismissed at an early stage of the appraisal process.

2.14 As part of the guidance, Sustrans supports the inclusion of the World Health Organisation’s (WHO) Health and Equality Impact Assessment (HEAT)¹ tool, which will provide robust calculations of the health impact of walking and cycling schemes. This tool is not currently part of the WelTag process.

2.15 Every opportunity to advance walking and cycling infrastructure should be seized and local authorities implementing new road developments should seek to identify how their development could link new communities/facilities into existing parts of the active travel network.

2.16 An example of where this has been successfully achieved is the traffic-free route that has been developed as part of the Church Village by-pass in Rhondda Cynon Taff. The path is away from the road and provides an attractive alternative route which recorded 86,000 trips in its first year. Paths away from the carriageway attract more users than those placed directly next to the road, therefore when constructing new road schemes consideration should be given to providing attractive routes away from traffic.

2.17 Demonstrating demand for walking and cycling infrastructure is not always either obvious or easy, especially where the opportunities for walking and cycling simply do not exist at present and so are not part of any local person’s routine journey. For example, until Pont y Werin was constructed to link Penarth with Cardiff Bay, levels of cycling between the two areas were very low, however, since the creation of a **direct, safe and comfortable route** usage figures have consistently been between 35,000 – 45,000 trips per month.

¹ tinyurl.com/3k8syj2

2.18 The predict and provide approach to managing traffic growth, still used by many transport planners, involves predicting future transport demand in order to provide the network for it, often by building more roads. This approach is frequently inappropriately applied to the provision of walking and cycling infrastructure: the model, using input data from a setting where active travel has been suppressed, predicts little or no walking and cycling in the future. Provision should be designed in these circumstances to encourage use.

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 Sustrans provided an official response to the consultation on the White Paper and also led a Conference in the Pierhead in June 2012 that brought together over 100 delegates from across Wales to discuss and challenge the key themes outlined in the White Paper.

3.2 Sustrans official response focussed on:

- The need for best practice design standards
- The provision of softer measures programmes e.g. adult cycle training
- The need for meaningful end-user engagement (strong consultation)
- Consistent monitoring and evaluation
- Funding to be allocated proportional to target levels
- A consistency across all policies that reflects the importance of walking and cycling

3.3 The Active Travel (Wales) Bill as introduced fails to take into account the majority of these issues, instead those that are mentioned are likely to be addressed in guidance accompanying the Bill.

3.4 The Explanatory Memorandum accompanying the Bill states that *"The lack of clear standards can discourage modal shift because potential active travellers can lack confidence in the quality of the route."* Sustrans welcomes the expert panel that the Welsh Government has set up to look at design standards. However, it is vital that the standards are mandatory and not advisory guidance – there is already a plethora of good quality advisory guidance that is largely ignored.

3.5 Consultation is referenced in the Bill, but we are awaiting the publication of guidance to see what level of engagement with potential users will be recommended. In Sustrans view, the levels of consultation required in sections 3 and 4 of the Bill (producing the map of existing provisions and the integrated network map) will differ. Our conference threw up the importance of consulting with young people in particular.

3.6 The common themes raised from the conference were:

- End user consultation
- The importance of 20mph limits
- The need for support on Compulsory Purchase Orders
- The importance of a collaborative approach between different sectors (health, education, leisure services, regeneration, tourism etc)
- The need for a softer measures programme
- Need to improve skills in local authority transport departments
- Measuring success
- Identifying the difference between rural and urban areas

3.7 Again, the provisions of the Bill make minimal reference to these points. The Explanatory Memorandum makes references to a *"broader programme of work to deliver a step change in active travel within Wales."* However, there are no provisions within the Bill to ensure that this broader programme of work sits alongside new infrastructure provisions and as the Minister has made clear there is no additional funding.

3.8 The Regulatory Impact Assessment (RIA) that accompanies the Bill seeks to address the issues caused by Wales being a varied nation comprising both urban and very rural areas by providing a population threshold of 2,000, below which local authorities will not have a duty to provide mapping. Many journeys in and between rural communities could easily be converted to active travel, and Sustrans view is that the population threshold is a crude and inappropriate measure of dealing with the issue of applying the concept and aims of the Bill across Wales.

3.9 The Bill has the potential to be one of the most effective public health interventions in Wales, reducing the significant burden on our health services of diseases linked to physical inactivity and obesity. To achieve this, the Bill will need to spread wider than transport departments, working with both health and education. However, there are no provisions in the Bill for making this happen.

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

4.1 It is not entirely clear what the aim of the Bill is. The White Paper set out an ambitious long-term vision, the Bill is principally concerned with the production of maps and the provision of infrastructure and does not address the wider elements that are needed to achieve that vision.

4.2 The White Paper for the Bill states that *“more is required than just providing a suitable route or showing people a map”*. Similarly section 3 of the Explanatory Memorandum entitled *“Purpose & intended effect of the legislation”* states that *“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.”*

4.3 However, the provisions contained within the Bill fall short of achieving the stated ambitions. In our submission to the consultation on the White Paper, Sustrans called for the Bill to follow the ‘Four E’s’ approach set out by the Department of Food and Rural Affairs in their document *“A framework for pro-environmental behaviours”*. This document states that *“There is not one but a multiplicity of ways of promoting greener lifestyles, confirming the need for packages of mutually supporting measures.”* We felt that the proposals set out within the White Paper failed to meet this approach and the Bill does not make any advances.

4.4 Evidence shows that providing new routes is simply not enough to deliver the culture change desired by the aims of the Bill. Evaluation of the Sustainable Travel Towns project in England showed that combining new infrastructure alongside softer measures has the greatest impact in increasing levels of walking and cycling. The report states *“where promotional measures were accompanied by improvements in the quality of the ‘offer’ (e.g. better bus services, or new cycle infrastructure), this yielded comparatively greater success. This was evident in Darlington in relation to cycling, and in Peterborough in relation to bus travel”* (The effects of Smarter Choice Programmes in the Sustainable Travel Towns, Sloman et al; 2010).

4.5 The provisions contained in the Bill, however, make no reference to softer measures/smarter choices programmes being offered alongside the new infrastructure, and the most appropriate method of achieving the aims of the Bill will be to combine new infrastructure with smarter choices programmes.

Targets

4.6 Both the British Medical Association (BMA) (*Healthy Transport, Healthy Lives*) and the National Institute of Clinical Excellence (NICE) (*Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation*) argue for the introduction of targets for increasing levels of active travel, and for these targets to be proportional to increases in funding.

4.7 Adopting a target-driven duty would ensure the overarching strategy developed and implemented by local authorities would focus on encouraging more people to travel in active ways. Targets based on increasing journeys – for example – to work or to school would help inform the basis for the integrated network map and ensure the future funding was directed in an effort to meet these targets.

Monitoring

4.8 The Bill also makes no provision for monitoring and analysing the interventions made in delivering the integrated network map. The Netherlands, Germany and Denmark are often revered as models of best practice in promoting a sustainable walking and cycling culture. This has only been achieved through implementing a total reformation of their transport, urban and land-use planning (Pucher & Buehler, 2008).

4.9 Recent Sustrans infrastructure projects delivered in Wales – the Valleys Cycle Network and the Connect2 programme supported by the Big Lottery Fund – included a requirement for local authorities to monitor the impact and use of the routes, through automatic counters and route user intercept surveys. The majority of routes delivered through Regional Transport Plans or the Safe Routes programme do not include scheme specific monitoring and as a result many local authorities in Wales have a lack of baseline data on walking and cycling.

4.10 The Bill creates an opportunity for the Welsh Government to collect baseline data across Wales and effectively monitor the impact of the work undertaken as a result of the Bill. However, the current provisions do not ensure this.

Compulsory Purchase Order powers

4.11 The Bill and accompanying documents make no reference to Compulsory Purchase Order (CPO) powers, which are available for highways provision. However, their application for dedicated active travel infrastructure is unclear and local authorities would be better served with additional support on land-use. Without effective support to ensure that land is made available, key sections of route which could make everyday journeys viable could take years to be delivered, or not be delivered at all.

4.12 In order to apply for a CPO, local authorities must show that no alternative routes are suitable. In practice there are often alternative routes usually along busy roads, however, they would not succeed in encouraging more people to walk or cycle. As these are not factors taken into consideration by Inspectors, a CPO application risks being denied. As this can be a lengthy and costly process this often discourages local authorities from applying for a CPO and routes therefore do not get developed or follow the path of least resistance as it makes a route 'deliverable', but sadly rarely desirable.

4.13 We are unclear on whether additional powers are needed or whether this can be addressed by Active Travel guidance to Inspectors. The process for implementing Compulsory Purchase Orders for walking and cycling routes should only require local authorities to define a single option through feasibility studies and, provided there is a reasoned approach for arriving at a preferred option, this should be able to be determined favourably via a Compulsory Purchase Order process without undue risk.

4.14 The nature of network design should be considered alongside route design by the expert panel that has been set up by the WG to devise design standards. We would like to see their recommendations enshrined in the delivery guidance given to local authorities, and clear guidance about the use of CPO powers.

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

5.1 The main barriers to delivering the key provisions outlined in the Bill will be availability of funding, the skill-set and capacity in local authority transport departments, including the willingness to move away from traditional highways engineering, and the use of WelTag to identify the costs and benefits of different transport projects.

5.2 As mentioned in our answer to Question 4, local authority transport departments are largely staffed by experienced highways engineers with limited knowledge of best practice designs and desirability for encouraging people to use active travel for everyday journeys. This presents a potential issue in particular in the production of the integrated network maps and analysing which are likely to be the most suitable and desired

routes for active travel. As this is an additional duty on local authorities, there are also likely to be capacity issues.

5.3 In our answer to Question 2, and in our submission to the consultation on the White Paper, we have set out our concerns with the current WelTag transport appraisal system, which has a significant bias to road schemes. This could prevent a barrier to analysing the desirability of active travel routes when creating and improving new highways (as identified in the key provisions).

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 The Welsh Government is currently clear in that it will not expect local authorities to spend any additional funds in the delivery of the Active Travel (Wales) Bill.

6.2 As written, the limited scope of the Bill will result in few financial implications for local authorities and Welsh Government. The most notable will be how the maps are funded and in particular the potential knock-on effect on money available for delivering the desired continuous improvements. It's not clear from the Bill and accompanying documents whether the map production will take place from existing funding streams or out of council budgets.

6.3 There could also be financial implications if local authorities feel that they do not currently have the capacity or skill set within their staff to produce the maps. However, the RIA does provide some cost guidance on tendering out this process and we do not consider the costs to be prohibitive when considering the total size of transport budgets.

6.4 It is important to frame the costs within the context of the benefits that investment in active travel will bring. As well as producing long term economic benefits through reduced health costs, lower welfare costs and increased productivity², active travel interventions also bring short term economic relief through reduced congestion and improved journey times.

6.5 The in-depth evaluation report on the English programme of Sustainable Travel Centres for the DfT concluded that **on conservative assumptions**, the benefit-cost ratio of the outcome achieved in the three towns, allowing only for congestion effects, is in the order of 4.5. They added "Including environmental, consumer-benefit and health effects on the basis of recent Department for Transport modelling could broadly double the congestion-only figure".

6.6 The World Health Organisation has developed a broader measure for capturing the economic benefits of investment in cycling named HEAT. By taking into account health benefits including better air quality and increased physical activity the tool shows that cycling schemes can typically bring a £9 return for every £1 invested. Indeed, using the HEAT tool to measure the impact of a project we managed to encourage the use of sustainable transport at 8 hospital sites across Wales, including at the UHW and Velindre, showed that for every £1 invested, a saving of £33.46 was made.

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 Sustrans has concerns about the balance between the detail on the face of the Bill and the accompanying guidance. In particular we have concerns that the strength of the guidance will determine the overall

² There are over 80,000 JSA claimants in Wales. With 40% identifying transport as a barrier to employment, some 32,000 individuals could benefit from improved transport. We estimate that this amounts to over £100m of JSA payments and a loss of tax income of over £37m

effectiveness of the Bill, yet the guidance has not yet been published and it isn't clear how the guidance will be scrutinised. We are also concerned that guidance can be altered significantly at the whim of a future Minister.

7.2 The Bill suggests that local authorities will have to refer to yet unpublished guidance on directions when determining:

- What is a suitable active travel route?
- How to prepare, consult on and publish the existing route map
- How to prepare, consult on and publish the integrated network map
- What will qualify as 'continuous improvement'
- How disabled walkers and cyclists should be considered
- How to take into account rural communities and their proximity to densely-populated localities

7.3 We have raised some of these issues earlier in our submission to the Committee. For example, when considering 'what is a suitable active travel route' the Ministers are likely to issue guidance on best practice design standards. These will not be mandatory standards, but even if the guidance is strong it could be altered in future with no scrutiny. We know that poor provisions can make cycling more off-putting than no provisions, yet in determining 'what is an active travel route' future Ministers could decide to support poor provisions or lower standards.

7.4 Sustrans believes that more of this detail should be brought on the face of the Bill a) to ensure proper scrutiny now; and b) to ensure that in future the Bill cannot be drastically watered down at the whim of a new Minister.

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

Timescales

8.1 The Bill makes provision for local authorities to spend three years delivering the first map indicating the existing active travel provision in their area. This time period seems overly generous and we would recommend a period of one year maximum to produce this map. A comparison can be drawn with the Scottish Core Paths Plan (2005), which gave local authorities 9 months to map their existing paths, a more onerous task considering it includes all rights of way. Swansea City Council took 3 months to produce their cycle map.

8.2 Again, three years to produce the second map seems too long. Sustrans would like to see significant engagement with end-users in bringing this map together. With that in mind, we would suggest a time period of no more than two years would be suitable.

Pre-amble

8.3 The pre-amble to the Bill reflects more on the limited nature of the provisions contained in the Bill than the aims and ambitions set out in both the White Paper and the Explanatory Memorandum to the Bill (as set out in section 3.17). We would prefer to see reference in the pre-amble to the broader aims of the Bill and not simply to the mapping process.

8.4 In short, the Bill creates a duty to provide maps rather than a duty to promote active travel. Maps are a means to an end, we are concerned that the Bill as currently drafted is in danger of portraying them as an end in itself.

Status of routes

8.5 The Bill also presents issues relating to the status of Rights of Way, where official clarification could be helpful. It is unclear whether an existing Right of Way identified in the integrated network map as a future active travel route would therefore lose its status as a Right of Way – as is the case with routes designated under

the Cycle Tracks Act 1984; or indeed if the reverse is true – would all new active travel routes automatically become a Right of Way?

8.6 Across Wales many routes exist that are neither classified as highways, nor Rights of Way. There are Permissive Rights of Way, whereby the land is leased from a landowner. If these routes are then included on the map, would this then convey a particular legal status on the route? Potentially, this could result in the need for renegotiations with landowners. We would welcome further clarity in the accompanying documents to the Bill.

8.7 There are also questions over maintenance of active travel routes that are not owned by the local authority. Will all routes identified and subsequently delivered as part of the integrated network map become the responsibility of local authorities to maintain? This would then lead to ongoing financial implications for local authorities. If so, will maintenance be included in guidance on continuous improvement? This could lead to a situation where local authorities could meet the terms of the Bill without delivering new routes.

Shared Use

8.8 The empirical evidence shows incidents of conflict on shared use paths are extremely low, and our recent report, *Access for All*, draws out the benefits of routes which allow families – including older people and those with disabilities – to undertake activities together.

8.9 Indeed, our report quotes Sybil Williams, the Director of the Cardiff charity Pedal Power, who fully supports shared use paths. She said “Segregation is not the way forward – people are isolated enough, and as has been demonstrated there is a social element when getting out, and segregation would not encourage this. It is, however, important that all users are educated to respect each other.”

8.10 All users of shared use paths have responsibilities for the safety of others they are sharing space with. Sustrans, British Cycling and the national cycling charity CTC have come together to endorse a code of conduct for all users of shared use paths to be safe and responsible. We would like the committee to consider endorsing something similar to accompany the Active Travel Bill.

20 MPH

8.11 Local authorities have the power to implement 20mph limits and zones in their local communities but the complications they face in exercising this power often discourage them from doing so. To support them in implementing this duty, greater guidance is needed.

8.12 Importantly, local authorities should be encouraged to implement area-wide 20mph limits as opposed to just isolated streets. This will ensure that through-traffic is displaced to arterial roads (designed to handle it) and not simply shifted from one residential street to another, to the detriment of other walkers, cyclists and residents.

8.13 Whilst we recognise the WG do not have powers to impose area wide 20mph, local authorities can, and would like to see explicit reference to 20mph as one of the suite of solutions councils can apply in developing an effective network.

Commissioner

8.14 Having a person independent of the Minister having oversight of the aims and objectives of the Bill, and being able to provide analysis on how the Welsh Government is doing in delivering this welcome new key aspect of transport policy, would pay an important role scrutinising the effectiveness of the Bill.

8.15 Sustrans appreciates that the creation of a new Active Travel Commissioner would perhaps be a step too far, but feel that the role could be assumed by the current Climate Change Commissioner as part of his overall responsibilities.