



# Consultation on the Active Travel (Wales) Bill

A response by:



April 2013

**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.**

Yes.

The benefits of an increase in active travel are clear. There will be benefits to health (reduction in sedentary lifestyles); to the economy (reduction in congestion); and to the environment (improvements to air quality). However, there is a widely held perception that walking and cycling schemes provide a low return on investment, which precludes more schemes of this nature being developed.

Decisions on the funding of walking and cycling schemes are currently considered alongside other modes, indeed they compete for funding from the same regional transport 'pot' as other modes. However, whilst appraisal methodologies for road, rail and bus are well established and quantifiable, this has historically not been the case for walking and cycling. Methodologies to quantify the impact of walking and cycling schemes are still emerging and, therefore, the traditional prominence of quantified cost benefit analysis as a decision-making tool has contributed to the perception that active travel schemes provide poor value for money.

The new Welsh Transport Planning and Appraisal Guidance (WelTAG) advocates equality in the appraisal of all modes and provides guidance on how to ensure walking and cycling schemes are given equal consideration. WelTAG promotes an holistic approach to decision-making by directing decision-makers to the summary of all impacts rather than just those quantified through cost benefit analysis. There are also emerging tools to assist decision-makers. The World Health Organisation's 'HEAT' tool, for instance, provides a method for quantifying the impact of active travel on the health service. However, whilst WelTAG recognises the HEAT tool, it also recognises that further research is required before it can be included in a cost benefit calculation.

Consequently, we believe prioritised walking and cycling schemes need direct support in the short-term to realise the true benefits of active travel whilst modern appraisal techniques become established. However, we also believe the ring-fenced fund for active travel could be phased into the regional transport funding pot over time. This would allow transport funding to continue to be directed where it is needed most, regardless of mode.

**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 proposals to identify and map existing and potential walking and cycling routes are welcomed. However, we believe guidance should be given on the target audience and accessibility of maps (web-based, paper, mobile phone apps etc). Guidance should be founded on robust research into value for money (i.e. coverage v cost). The maps will be a key marketing tool providing information to all potential users. Sufficient funding must be allocated to marketing and distribution to maximise the benefits of the Bill.

Readily accessible information will also bring benefits to other areas such as development control and will ensure active travel has greater prominence in decision making processes.

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

In principle the proposals are welcomed. However, we believe there needs to be further guidance on the alignment with RTP preparation and ongoing delivery plans, particularly where there is potential for competing demands on limited resources.

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

In principle, this proposal has merit and would ensure cycling and walking networks continue to be given greater emphasis. However, to change the mindset of the Welsh population in favour of active travel requires a generation of initiatives and support. Continuous improvement over a long period should also include 'softer' measures, such as greater incentives to purchase bikes, as well as new infrastructure dedicated to active travel.

Transport schemes are most beneficial when fully integrated. Walking and cycling schemes should not be implemented in isolation from all other schemes, they should connect communities and, more specifically, connect transport interchanges. Complementary measures should be introduced over time – a bike hire scheme, for example, could be located at key transport hubs connecting walking and cycling routes with bus and rail stops.

On the assumption walking and cycling investment schemes will be prioritised, we would expect diminishing returns from schemes later in the programme. Therefore, whilst active travel has obvious health, social and economic benefits, the Welsh Government must ensure that modal equality in investment decisions is paramount. Investment in transport should be targeted where it is needed most, such as people vulnerable to social exclusion. Continuous appraisal, monitoring and evaluation are essential to ensure walking and cycling schemes continue to provide community benefit.

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

We agree that all new road building schemes should consider the needs of pedestrians and cyclists. At present these needs are considered through the Environmental Statement as well as non-motorised user analysis and audits of proposed designs as required in DMRB. However, these current methodologies tend to measure the impact of the road scheme on walking and cycling rather than considering how walking and cycling could be a fundamental part of the scheme design from the outset.

The application of the new WelTAG guidance will address this problem. WelTAG advocates the build up of packages of multi-modal measures to optimise the benefits of a scheme to the population rather than a single mode type. It is mandatory that all new road schemes requiring funding or approval from the Welsh Government should be subject to WelTAG. WelTAG has been fundamentally updated and is ready to be published by the Welsh Government.

**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.**

It is pleasing to note the Bill itself does not state in detail the routes and facilities to be mapped which was a concern we submitted in the earlier Welsh Government consultation.

However, the Bill does state the Welsh Government will provide guidance to local authorities on the content, format and consultation of the maps. There needs to be a reassurance that this does not become too prescriptive and that the guidance enables professionals to exercise their skill and judgement in implementing the Bill.

The consultation element of the guidance will also need to consider sometimes the conflicts that can exist between the views of local communities and local user groups. Some of the evidence from Scotland on the work on mapping routes has revealed local tensions which are difficult to reconcile.

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

The key provisions are welcomed. They cover the provision of new infrastructure and provide information (maps) regarding the existing and proposed infrastructure. However, there are some additional items that should be considered:

- 'Softer' measures, such as personalised travel planning, are proven to be effective in changing travel behaviour, particularly when implemented alongside new infrastructure. Such measures should be a key component of the guidance and should be implemented to local communities concurrent to any new infrastructure
- Incentives for people to use bikes should be investigated further. Incentives could include subsidies on the purchase of a new bike and a successfully operated bike hire scheme at strategic points. Indeed, a bike hire scheme should be integrated with public transport to provide active travel options from transport hubs
- WeITAG is a mandatory tool for planning, developing and appraising new transport schemes. It is critical that WeITAG is used effectively to provide the best 'mix' of schemes to optimise benefits to the local population. WeITAG should be at the forefront of any new guidance to local authorities regarding the Bill.

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

We believe the potential barriers to the implementation of the bill revolve around two key areas: funding and guidance.

**Funding:** A step-change in mode shift to active travel will not happen overnight. It will require a change in culture and mindset which can take a generation. For the Bill to be effective it must have a long-term guarantee of funding. There is a risk of a mismatch between long term aspirations and what can actually be delivered. Whilst network maps are designed to take a longer term view of the evolution of walking and cycling provision, it is possible that budgetary constraints and demands from competing transport schemes could potentially devalue the importance of these maps.

Guidance: The effective implementation of the Bill requires buy-in from local authorities and freedom to implement schemes that suit local circumstances. A fine balance will need to be achieved that ensures commonality in standards and delivery but at the same time enables local authorities to use professional judgement in applying the guidance.

**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.**

It is unclear how the Bill will interact with the RTP programme. Will Active Travel and RTP programmes be considered independent from one another? Will local authorities no longer consider active travel schemes within RTPs or will local authorities have the flexibility to fund further active travel measures from their RTP pot?

The significant costs of the mapping and consultation work will be largely frontloaded in the first three years. For most local authorities, local resourcing will be a considerable challenge for them.

In terms of the wider financial implications, we believe there will be benefits in areas such as development control. The availability of maps will reduce some of the need to assess and review sustainable transport networks that applicants will have to undertake. It will also ensure that new developments have a better strategic fit with the longer term walking and cycling aspirations outlined in the integrated network maps.

**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?**

We have recently prepared guidance documents on behalf of the Welsh Government, which included detailed rounds of consultation with stakeholders (users). It is evident that the priority of users is to have a clear, concise and prescriptive document, where possible. There is clear evidence that users are put off using a document that is long, text heavy and has an unclear starting point. In many circumstances, guidance documents with these characteristics will be ignored. Fundamentally users want answers to the following questions immediately – Where do I start? What do I have to do? What will the output look like?

Despite a preference for a prescriptive document, it is recognised that a balance should be struck in providing sufficient guidance but at the same time not to being too prescriptive that it constrains local professional judgement and interpretation. Local professionals should be allowed freedom to arrive at the most beneficial solutions for their local areas. There needs to be a balance.

The guidance itself will need early and ongoing support by Welsh Government officials so that local authorities do not run into later difficulties in securing ministerial approval.

A critical issue is how the Bill will be monitored and to what extent local authorities will be expected to monitor and evaluate the Bill. Monitoring is essential. It allows the Welsh Government to determine the success of the Bill but also the success of component schemes. It allows future guidance to be shaped by lessons learnt from previous schemes - what

worked well and what can be improved. Conversely, annual monitoring of multiple schemes across Wales will be a costly exercise and guidance should carefully consider the balance between the costs and benefits.

There is an opportunity to build up a bank of evidence in active travel which will provide a real insight into what works well and what doesn't. This evidence can be extremely useful in developing appraisal techniques as well as informing the planning and design of new schemes.

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

It is important that the guidance makes clear links to other Welsh Government guidance such as WelTAG. There must be evidence that the best performing schemes have been selected on the basis of appropriate appraisal and a clear audit trail on how those decisions have been reached.

All investment in Active Travel must be accounted for and the benefits of all investment must be robustly monitored and evaluated.

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