

## **Introduction**

The Association for Consultancy and Engineering Cymru Wales' response comprises the agglomerated views and evidence from key member organizations.

The structure follows the two-stage headings and sub-headings of the consultation commissioning document.

---

## **1 Assessment of the implementation and operation to date of the Act**

### **1.1 How far the stated objectives of the Active Travel Act are being achieved**

1.1.1 Since 2013 cycling provision and activity in the South Wales region is encouraging, particularly in Cardiff. There have been 11.5m bike trips in Cardiff per year – a 28% increase between 2013 and 2014 (source: Bike Life Cardiff Report).

1.1.2 Formal submission of integrated network maps and public consultations on existing and future active travel routes shows Local Authorities' (referred to hereafter as LA) commitment to provide for Active Travel needs.

### **1.2 The effectiveness of subordinate legislation and guidance made under the Act**

1.2.1 Active Travel Design Guidance (referred to hereafter as ATDG) provides standalone and simplified design guidance. The audit tools set out standards by which to evaluate active travel routes, however these could be refined further to reflect local characteristics and the requirements of less urbanized areas. The ATDG and audit tools were developed in collaboration with major campaign groups, cycling organizations and practitioners in the industry, giving them credibility. They capture lessons learnt from prominent schemes both in the UK and internationally.

1.2.2 The ATDG is well used across the UK as current best practice for LAs and practitioners. The Department for Transport (referred to hereafter as DfT) directs local highway authorities to the ATDG for producing Local Cycling and Walking Improvement Plans. There are English LAs that have adopted the term Active Travel.

1.2.3 Welsh LAs, and the promoters of major highway schemes, follow the ATDG as the Act places a duty on promoters of all Welsh transport schemes. We understand that all twenty-two Welsh LAs have developed existing route maps and integrated network maps. Some have identified very few routes on their existing route maps while others have done more

extensive work to identify a more comprehensive starting point. Generally, there appears to be uncertainty about future funding for year-on-year improvements.

1.2.4 Feedback indicates that the application of the ATDG to trunk road schemes would benefit from clearer guidance and early consideration during the scheme objective setting stage. Culturally, trunk road promoters should align with the expectation that new transport schemes should add value for active travel users.

### 1.3 What action should be taken to improve the effectiveness of the Act and its implementation

1.3.1 Make the Act's requirements more conspicuous to developers that do not regularly operate in Wales.

1.3.2 Expand the ATDG to cover less than perfect site conditions. For example, in south Wales' valleys towns, key routes commonly exceed a gradient of 1:40.

1.3.3 With cross-authority walking and cycling being commonplace, consider adopting a more strategic/centralised mapping and route-development approach.

1.3.4 Provide guidance to address fragmented and disjointed networks through urban areas and across authorities' boundaries to form continuous routes.

1.3.5 Clarify what constitutes enhancement.

1.3.6 Provide guidance on the level of survey-based evidence required to understand whether a scheme impacts on active travel users.

1.3.7 Clarify the spatial scope with which active travel users should be considered. For example, limit intervention to where the scheme interacts with existing active travel routes only or with communities, or whether there is a need for a wider, more strategic approach to the opportunities a new scheme might create. For example, a North Wales trunk road scheme provided only for active travel users within the scheme limits.

1.3.8 Provide further guidance aimed primarily at private developers setting out how residential and commercial developments might contribute towards future active travel routes.

1.3.9 Co-ordinate Active Travel schemes and wayfinding material at a national level, linked to the National Cycle Network.

1.3.10 Unlock Active Travel barriers by promoting schemes such as wayfinding, cycle parking and adult cycle training.

1.3.11 Set strategic targets and look at engaging communities to monitor the success of Active Travel schemes to assess against the targets.

1.3.12 Expand current appraisal methods to consider the impacts of Active Travel schemes.

1.3.13 Provide a consistent funding stream for interventions that are not funded by development gain. It appears that some LAs struggle to fulfil the Act's requirements year on year because of competing budgetary pressures.

## 1.4 How far has the Act represented, and will continue to represent, value for money

1.4.1 The Act usually increases the cost of developments and requires public funding. Current appraisal methods focus on journey time benefits and thus are not suited to appraising Active Travel schemes. Active Travel schemes can delay motorized traffic, causing economic dis-benefit using current assessment criteria. For example, schemes that require traffic light-controlled road crossing points. Therefore, any test of value for money would be weak at best using established criteria.

1.4.2 A better test might be to consider the added value, or the cross-portfolio impacts over the longer-term. For example, looking at the impact the Act is having on the growth in walking and cycling and the benefits this brings to people's health, lowering emissions and providing recreation opportunities.

## 2 Assessment of the effectiveness of wider active travel policy in supporting delivery of the Active Travel (Wales) Act 2013

### 2.1 The effectiveness of the Active Travel Action Plan

2.1.1 The Active Travel Action Plan gives good guidance on designers' roles and responsibilities and clarifies how clients should interact with the process.

2.1.2 The Act has had positive success in terms of LAs mapping and planning routes. However, there is variance in its application and success. For example, there are quick wins to disperse non-motorized users (NMU) throughout key urban areas, but the more difficult challenge is to provide them with longer-range access to urban destinations. Ironically, these projects could add more value, considering that there is likely to be latent demand for safe NMU commuter routes.

### 2.2 Whether sufficient funding and capacity are available to support implementation of the Act itself and wider active travel policy

2.2.1 The short answer is no. There has been some central government support but, in the main, the Act requires local authorities, private developers and trunk road capital budgets to fund the duties imposed. Due to fiscal constraint, without adequate and assured local transport funding, promoting Active Travel is likely to be at the expense of other

planned spend. This does raise the question as to whether year-on-year route development is viable.

## 2.3 The operation of the Active Travel Board

2.3.1 We are aware that the Active Travel Board scrutinized and challenged aspects of a trunk road project in North Wales for compliance with the Act. Our understanding is that the challenge was not upheld. (In most cases, this type of project is scrutinized in detail at public local inquiry.)

## 2.4 Whether active travel is integrated effectively in wider Welsh Government and local government policy

2.4.1 Integration appears patchy. Areas for improvement include: planning for new schools and earlier engagement in trunk road project planning. National Health Service Wales has, on at least one project, identified and championed Active Travel successfully.

2.4.2 Technical Advice Note 22 makes singular reference to the requirements of the Act. Developers outside Wales, looking to implement schemes in Wales covered by the Act, would benefit from more detailed information to avoid late design changes and additional cost.

---