

The Council's responses to the various points raised in the letter inviting the provision of evidence are set out below, alongside the original lines of questioning:

1. To assess the implementation and operation to date of the Active Travel (Wales) Act 2013, including:

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

1.1.1 The stated aim of the Active Travel (Wales) Act 2013 is to make active travel the most attractive option for most shorter journeys and enable more people to undertake active travel, meaning more people can enjoy the benefits of active travel. The production of the Existing Route Maps (ERM) will make it easier for residents in the County Borough to identify where infrastructure that is deemed suitable for active travel exists and this will help to promote the use of active travel modes for short every day journeys.

1.1.2 The production of the Integrated Network Maps (INM) will also assist local authorities to raise awareness of their future active travel proposals, not only amongst local residents and visitors but also with developers and other stakeholders who may have an interest in land-use developments within the local area.

1.1.3 A lack of resources to design and publish promotional material to engage the public is likely to restrict the ability of local authorities to fully utilise the active travel maps as a tool to promote active travel use. Whilst the maps are useful as a source of information for local authority officers, particularly in terms of planning future infrastructure interventions, in their present format which is dictated by the current mapping system, the maps are not in a format which makes them easily accessible to the general public due to the amount of information shown and how that is presented.

1.1.4 In principle the duty on local authorities to secure continuous improvements in active travel infrastructure is sound. However, it is wholly reliant upon the availability of the necessary funding to allow the delivery of routes and facilities. In the absence of a dedicated funding allocation for active travel, the only sources of funding open to local authorities are grant funding programmes or securing provision through the planning process in the form of planning obligations. As a result, a positive change in the level of use of active travel infrastructure will be dependent upon sustained investment to deliver infrastructure and to promote active travel generally.

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

- 1.2.1 The supporting guidance provided to help deliver the Act has generally been useful throughout the process. In particular, the detail contained within the Design Guidance has proved valuable during the development of schemes and the assessment of proposals received from developers. In addition, the Design Guidance clearly set out the process for preparing the Integrated Network Maps and whilst the main document content was lengthy, the provision of a flow-chart following commencement of the INM preparations made the process easier to understand.
- 1.2.2 The timing of the release of some additional guidance caused some complications for local authorities as, in some instances, it was necessary to begin preparations for particular work stages prior to receiving the guidance in order to meet the overall INM submission deadline.

1.3 Any action which should be taken to improve the effectiveness of the Act and its implementation.

- 1.3.1 There is now an opportunity to refine the Design Guidance to take account of feedback from all stakeholders, particularly the views of LA engineers and officers in relation to the suitability of some of the less well accepted design elements contained within the guidance, and their experience of implementing them.
- 1.3.2 Any refresh of the Design Guidance should now include examples, ideally from Wales but at least from the UK, of locations where design elements included in the guidance have been successfully implemented.
- 1.3.3 Consideration should also be given to the provision of additional clarification for some elements of the INM process, including the data to be captured and presented on the maps, in order to help achieve a greater level of consistency in information provision across Wales. Clearer definitions would also provide greater certainty for LAs during a future INM development process.
- 1.3.4 Clearer information regarding the role of audits for the INM process will be required for any further iterations of the maps. A lack of clarity of what was required, and the level of detail to be provided, created uncertainty amongst local authority officers and may lead to a varied approach across Wales.

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

- 1.4.1 The financial support provided by WG was welcome and assisted the Council to undertake a comprehensive development process for the INM. However, initial calculations suggest that the funding provided represented only a third of the total cost of undertaking the work. This cost did not take account of the full amount of officer time required to complete the work, including time spent by colleagues to support the transportation section during the consultation and engagement process.

1.4.2 Had additional funding been available, it is likely that greater involvement with children and young people would have been possible in terms of additional sessions with schools especially, that a greater number of public engagement sessions would have been arranged and that additional promotional material could have been produced to raise awareness of the consultation.

1.4.3 The long-term benefits of encouraging modal shift are likely to mean that investment in infrastructure and promotion of active travel will represent good value for money. However, this will require continuous investment and an appreciation that behavioural change, including modal shift, may only provide beneficial results in the latter stages of the INM development period.

2. To assess the effectiveness of wider active travel policy in supporting delivery of the Active Travel (Wales) Act 2013, including:

2.1 The effectiveness of the Active Travel Action Plan;

2.1.1 Whilst some of the actions contained within '*The Active Travel Action Plan*' have undoubtedly assisted local authorities in delivering infrastructure that supports active travel, and promoting active travel, the Action Plan itself would benefit from greater promotion and more regular updates with regard to progress on delivering the actions.

2.1.2 Action 9 in the Action Plan to "Consider whether TAN 18: Transport and TAN 12: Design would benefit from being updated to further promote active travel through the planning system" should be updated as the provision of greater support for active travel through the planning system is considered vital to allow local authorities to maximise opportunities presented by developments within their area.

2.1.3 A new Action Point should be included within the Action Plan which requires all future school development proposals to incorporate the identification and provision of infrastructure that enables and encourages use of active travel for those wishing to access the school site. The consideration of active travel as a fundamental part of the development of these school modernisation plans is the most appropriate way of ensuring that active travel is built into the ethos of schools.

2.1.4 The Action Plan should be updated regularly, at least annually. The current version available via the WG website dates from February 2016 and updates on progress against each of the Actions together with revised deadlines is urgently needed.

2.1.5 Action Point 17 refers to a national communication strategy for active travel. This would have been of significant benefit to local authorities during the preparation of the INM and is still required in order to promote the benefits of active travel and to provide a framework which can support more targeted promotion by local authorities.

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 provision of dedicated active travel development funding for the 2018/19 financial year through the WG Local Transport Fund is a significant positive step and has been requested by local authorities over many years. This is a positive development but it will need to be sustained over the long-term to ensure that the schemes which are likely to generate the greatest benefits can be developed.
- 2.2.2 The lack of dedicated funding for capital projects to deliver active travel infrastructure is, however, disappointing, although it is accepted that the Safe Routes in Communities programme will attract funding bids which seek to deliver active travel improvements. The provision of a dedicated funding stream for active travel schemes, with 3-year funding timescales rather than the present single year financial allocations, would greatly assist local authorities in developing those complex or extensive active travel schemes which may generate the greatest benefits but which at present cannot be delivered in a single financial year.
- 2.2.3 The financial support provided by WG to develop the INM was welcome and assisted the Council in undertaking a comprehensive development process. However, as indicated in Point 1.1.3 above, this funding did not cover the full costs of completing the process in line with WG requirements. As a result some local authorities experienced resource constraints during the development of both the ERM and the INM processes, with adherence to the guidance often being reliant on the dedication of one or two officers in a given local authority. A similar scenario can be anticipated for any future iterations of the process as a result of continued scarcity of local authority resources. Funding for capital projects needs to follow to enable delivery of active travel schemes and to promote its use.
- 2.2.4 As indicated in Point 1.1.5 above, the lack of resources to design and publish promotional material in support of the Act, such as the production of Active Travel Maps for the settlement areas designated by WG, may reduce the effectiveness of promoting active travel to a wider audience and in particular those who are not inclined to travel actively at present.

2.3 The operation of the Active Travel Board

- 2.3.1 The Board appears to benefit from a wide range of relevant stakeholders from a range of all interested sectors. There is, however, limited representation from local authorities. Greater representation from the organisations most responsible for the delivery of the duties imposed by the Act would ensure that future Actions and proposals considered for inclusion within the Active Travel Action Plan are reasonable, practical and deliverable. Additional local authority representatives, perhaps one from each of the regions, even on a

rotational basis, would also provide regular feedback to the other Board Members regarding the impact of the Act and its implications in real terms.

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

- 2.4.1 Active Travel currently does not appear to be sufficiently well integrated in wider Welsh Government policy. This is certainly the case in terms of education and the delivery of future school modernisation proposals, where there needs to be a greater requirement on the Local Education Authority and schools to include the consideration of active travel access as a fundamental principle when selecting school sites and designing proposals for new schools, rather than treating it as an afterthought.
- 2.4.2 Some consideration was given to active travel during the design of 21st Century Schools projects; this related mostly to the provision of cycle parking facilities within the schools in compliance with the Council's Supplementary Planning Guidance on Parking Standards. As the Act was not in force when the original 21st Century Schools projects were being developed, and the criteria associated with the programme did not specifically require it, no detailed consideration of active travel was made.
- 2.4.3 In addition, the restriction on the use of funding for 21st Century Schools imposed by Welsh Government so that only works within the red-line boundary of the development proposal site could be funded through the programme, coupled with the limited capital resources available to the Council for works outside that boundary, meant that little consideration was given to the provision of new or the enhancement of existing active travel routes beyond the school site. In some cases, this has limited the Council's ability to deliver suitable infrastructure to encourage the use of walking and cycling as a sustainable means of accessing the school from within local communities.
- 2.4.4 In relation to the relationship between active travel and planning, local authorities would benefit from a strengthening of planning policy and guidance to reflect the desire to more closely integrate active travel within developments. This would empower local planning authorities when attempting to secure contributions or investment in active travel from developers. Active travel needs to be embedded into the planning system so that it is not seen as an additional burden on developers but as a fundamental accessibility requirement for the development of a site.