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e-mail response sent to: activetravel@gov.wales

Dear Sir/Madam,

Response to: Active Travel Guidance

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to respond to the above consultation. Since this consultation was issued the Coronavirus pandemic has dramatically impacted on our lives and introduced changes in perceptions and behaviour. It has provided a whole new context against which to plan, in particular in relation to active travel. Policy and guidance, including this consultation document needs to take this into account, capturing recent behavioural change, identifying ways of sustaining this and resolving any conflicts arising from extending active travel provision.

Our response to the consultation questions is set out below. If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

Active Travel Guidance Consultation questions

Q1: The revised guidance seeks to eliminate unnecessary duplication and to reformat the guidance into a single manual in two parts rather than the previous two completely separate documents.

Does the document work better now as a cohesive set of guidelines with equal status between technical and delivery elements?

Please enter here:

The revised guidance is a lengthy document, covering a wide variety of issues under the overarching theme of active travel. Given the vast content, it is unclear who the target audience is and in some places the document can be repetitive and disjointed, which makes it difficult to use and digest.

Key messages are lost in its length and detail. These need to be drawn out and made clear in the final document. For example, it is important to set out that the planning system has a key role to play in ensuring that safe and efficient provision for active travel is built in at all stages of plan making and the development management process. Planning mechanisms including conditions on planning consents and planning obligations should be used to secure funding and the provision of improved opportunities for active travel, whether on site for new development or linking to / serving that development.

The important content in Part 1 (Delivery) is the preparation and publication of the map, and in Part 2 (Planning and Design) it is design solutions. It is very difficult to extract this information, as it is buried in background and historic context, reasoning etc. For example, the section titled "Why do People Cycle?" (part 2, page 85). This section also appears to contain historic data (fig3.6, "2005-2007 collision data involving cyclists aged >25 and drivers"). While some of the information is interesting, we question whether it is required, or if the guidance is the right place for it? An online appendix might be a more appropriate home for the useful background information.

The design sections could be presented in a more inspirational way. It would be useful to have problems set out alongside well designed, innovative solutions.

We would suggest that the Design Commission for Wales, Sustrans Cymru and Living Streets Cymru be approached for input into more inspirational design case studies and solutions. The photographs of good practice provided in the document do not appear to be innovative schemes or examples.

We note that paragraph 2.5.2 is a large block of text, taken directly from Planning Policy Wales Edition 10. The guidance could just cross-reference other statutory planning and related documentation and summarise, rather than repeat large blocks of text.

As set out in our covering letter, the document needs to take account of the recent pandemic, capturing recent behavioural change and identifying ways of sustaining this.

Q2: The revised guidance seeks to place greater emphasis on the duties of the Act specifically being about creating modal shift towards walking and cycling.

Has this been achieved and if not what would you like to see added to help enforce this overarching aim of the Act?

Please enter here:

While there is a lot of information in the draft guidance on the physical infrastructure required for active travel, much more emphasis is needed on behavioural change. This goes beyond what can be delivered on the ground and includes partnership working across the sectors including Government, communities, businesses, educators, the health sector etc. For example incentivising employers to encourage walking and cycling to work or meetings and educators to promote the well-being benefits of walking children to school etc.

Digital communication can help to engage some sectors and members of our communities in preparing active travel maps and generating ideas. For example apps that allow people to input their suggestions/agree/disagree with ideas on how to create more space for walking and cycling in their communities.

Digital infrastructure is an important factor in educating and encouraging a change in behaviour, having significant influence, for example, Couch to 5k, Strava, Garmin etc. Enabling the active travel maps to be more user friendly and interactive would be a useful tool in encouraging behavioural change and has the potential to capture a lot of information. However it is also important to reach and involve those communities that are not engaged in digital communications and we are pleased to see that this is acknowledged in the consultation at paragraph 6.1.10 (page 46) “different types of consultation will be accessible for different people”.

A key issue in the successful provision and use of active travel provision is local government resource. In this regard, we do have concerns about the capacity of local planning authorities. Most authorities have lost significant capacity in recent years, yet support for planning authorities would improve integration and mitigate risks around projects requiring planning consent. Employing planning staff with specific responsibility for active travel would help the focus and integration of active travel. In some cases expertise could be shared between local authorities or jointly resourced teams could be established.

In terms of delivery and the implementation of schemes, authorities rely on Section106 agreements to secure off-site contributions, which does assist with immediate locality improvements, but the sums gained are usually not sufficient to fund larger schemes and Welsh Government funding is heavily relied upon.

Q3: Do you agree with the intention to show both the Existing Routes Map and Integrated Network Map together as the Active Travel Network Map (ATNM) in future mapping cycles? (1.1.4 and 5.5)

Please enter here:

No comment

Q4: The policy context has been updated reflecting new laws and regulations. This includes an explanation of links between Planning Policy Wales 10 and Active Travel and also how active travel dovetails with the principles and approach set out in Well-being of Future Generations Act.

Are there other policy area links which should be highlighted and if so what information about them would you like to see included in the guidance?

Please enter here:

As a priority, policy and plan intergration is required across sectors, including planning, health and transport. Plans such as Strategic Development Plans, Local Development Plans and Local Transport Plans are all likely to have a role in testing and securing the deliverability of infrastructure.

Equally, planning is critical to promoting healthy places. We need to develop more integrated strategies for healthy placemaking, gather greater shared intelligence to guide decisions and investments and involve more professions and communities in promoting healthy places.

The Welsh policy framework would be strengthened by emphasising the importance of the links between policies, plans and strategies and the shared use of the evidence that they provide.

Opportunities for shared/integrated funding should be sought to encourage joint working and maximise the benefits on the ground.

Q5: The guidance now highlights more clearly that the duties under the act fall to the whole local authority and lists sections of particular relevance to certain functions.

Are there further areas that should be highlighted?

Please enter here:

Public Service Boards should ensure they promote active travel and relate to local authority ambitions and proposals.

Q6: The concept of mesh density for the active travel route network has been introduced with a view to a mesh of 250m needing to be achieved by the third time the maps are updated.

Does this clarify previous ambiguities about what constitutes an active travel network?
(5.6.4)

Please enter here:

No comment

Q7: If your role involves fulfilling statutory duties under the Active Travel (Wales) Act 2013, does the revised guidance provide you with greater clarity on how to do so? If not, what else would you like to see covered?

Please enter here:

No comment

Q8: Please highlight any other points you wish to make in relation to the revised Part 1: Delivery.

Please enter here:

No comment

Q9: Specific design details have been provided to align with the updated Traffic Signs Regulations and General Directions (TSRGD) 2016.

Are you confident in the consistency of approach between various sets of guidance, for example on dealing with junctions or treatment of side road interfaces with active travel routes?

Please enter here:

No comment

Q10: The width required for cycle tracks for different cycle flow bands has been adjusted, which may reduce the width requirement for parts of the network envisaging moderate use. (DE021, DE023)

Do you consider the right balance has been struck between enabling additional routes to be created and the comfort and safety of all users?

Please enter here:

No comment

Q11: In relation to design elements, have any design features not been included which you consider would be essential in helping deliver high quality schemes?

Please enter here:

No comment

Q12: On an individual scheme level, the explicit requirement to undertake an Equality Impact Assessment at the earliest stage is intended to ensure that full engagement with all users informs the scheme design.

How confident are you that this process will enhance the quality of schemes and minimise potential conflict between users who have differing access requirements?

Please enter here:

No comment

Q13: Chapter 20 on Monitoring has been expanded to give more specific guidance and includes a template.

Does this provide sufficient clarity?

Please enter here:

Current RTPi research is exploring the means of assessing planning on the explicit aspirations of planners and politicians, in terms of placemaking and social, economic and environmental value. This would help to enable local authorities and national Governments to go beyond simple metrics like speed of processing applications and number of housing units delivered. This project is supported by Welsh Government and due to be published in Autumn 2020.

<https://www.rtpi.org.uk/research/2019/february/measuring-planning-outcomes/>

RTPi Cymru would be happy to share early relevant early findings from our Wales focus group. Please contact walespolicy@rtpi.org.uk for more information.

Q14: Please highlight any other points you wish to make in relation to the revised Part 2: Planning and Design.

Please enter here:

No comment

Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011.

We would like to know your views on the effects that the Active Travel guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Any investment in the many different areas supporting active travel and the guidance itself, for example digital communications, promoting behavioural change etc should support and respect linguistic needs and the implementation of Cymraeg 2050.

Question B: Please also explain how you believe the proposed Active Travel guidance could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

See above.

Question C: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

No comment