

Enterprise and Business Committee
Active Travel (Wales) Bill
AT 31 – Keep Wales Tidy

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

3rd April 2013

Dear Ms Thomas,

Written Evidence to Enterprise and Business Committee on the Active Travel (Wales) Bill

Keep Wales Tidy (KWT) is a charity aimed at encouraging local action to protect and enhance the environment of Wales. We work with communities and schools throughout Wales and aim to influence behaviour change through:

- Programmes which improve the quality and sustainability of the environment, including Tidy Towns, Blue Flag Awards for Beaches and Eco-Schools.
- Advice and technical expertise to Government and partners.
- A means of translating strategic policy into effective local action.
- Campaigns on a range of environmental issues.

KWT operates at international, national, regional and local levels. Our vision is: *"a beautiful Wales that's cared for and enjoyed by all."*

KWT therefore tackles far more than just litter and waste - our aim is to encourage the public to take responsibility for their environment by providing them with the utensils and the education to do so. Encouraging behaviour change which leads to more responsible environmental action is at the heart of what we do.

KWT's work is closely aligned to the aims of the Active Travel Bill and we welcome the opportunity to put forward written evidence. Our response draws heavily on our experience of operating the Eco-Schools Wales Programme.

Yours sincerely



Lesley Jones

Chief Executive

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.

KWT believes that the Bill will be an important step in encouraging more people to walk and cycle as part of their everyday travel. It is widely recognised that a higher number of short journeys could be undertaken by non-motorised means - and that this shift would increase exercise levels and result in a healthier population. At the same time, decreasing the number of cars on the road, particularly at peak periods, would reduce congestion and pollution levels.

Attempts at encouraging more walking and cycling have, to date, been piecemeal and largely ineffective. There are many real and perceived barriers to encouraging this change including:

Highway Authorities are still focussed on delivering infrastructure for motorised travel and are given only limited incentive or encouragement to improve paths and cycle routes. Political pressure will always be focussed on road improvements, and maintenance issues such as repairing pot holes and so forth.

In addition, Highway Authorities have limited budgets to ensure paths and cycle routes are adequately maintained and free from litter, fly-tipping and graffiti. This has an effect on the public's perception of safety. KWT's research has confirmed that there is a relationship between low environmental quality and anti-social behaviour and crime figures. Such routes are therefore unlikely to be used by the public and this creates a spiral of further decline and less expenditure on upkeep.

The public have little or no awareness of existing routes and generally do not lobby for improvements to the rights of way network for walkers and cyclists.

There are only a few segregated cycle routes and those that do exist are not always useful in terms of connecting residents to places of work or other destinations. And finally, the public have a perception that on-road cycling is dangerous.

These barriers are regularly highlighted to us in discussions with head-teachers and Eco-School coordinators.

For example, a large secondary Eco-School highlighted recently that a footpath leading to the school was under-used by both pupils and local residents due to the litter-strewn, dirty and obstructed path. The school's Eco-Committee resolved to improve, clear and tidy this particular route and almost overnight the path was once again absorbed into normal use by both students and local residents. The appearance of such paths highlights the 'unsafe' perception of these routes. Often, segregated routes are also seen as a potential danger for pupils. They are perceived as 'out of the way', unlit and easily identifiable as locations where

you would find school children at fixed points during the day – a potential threat to child safety.

Dog fouling on routes to school is also seen as a barrier to active travel. One village primary Eco-School have seen this as such a major barrier that they have requested support from KWT to launch a 'Bag it & Bin it' campaign in the village to counter the problem.

From the schools' perspective, highlighting active travel routes to school for pupils are often seen as a risk by head teachers. There is a strong feeling that pupils' method of travelling to school safely is a parental responsibility. Even morning 'walking buses' do mean schools assuming responsibility for pupils much earlier in the day.

Anecdotal evidence from schools also suggests that routes are often unknown, this is not necessarily the biggest barrier to active travel to school however – many routes are known locally, it is the lack of onward routes to work that could be seen as the greatest barrier.

The Bill will therefore be a very significant step in ensuring that some of these barriers are removed. It will be important to remember though that the Bill alone will not be a single solution. Other measures, incentives, publicity and awareness-raising initiatives will be necessary to ensure that agencies are coordinating efforts to provide and maintain the right infrastructure for walkers and cyclists in the right place, and that the public are aware of the opportunities and encouraged to switch from car travel for short journeys.

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);**

This will be a key component of the Bill and is warmly welcomed. Drawing up integrated maps will help identify gaps in the network and this will be a focus for future improvements. It will be vital that the maps are subject to widespread consultation and that the public are encouraged to participate. The danger of course is that Highway Authorities pay lip service to the maps and that only the usual pressure groups express a view. The production of the maps therefore needs to be accompanied by extensive publicity and local meetings to encourage wider interest and participation. As part of this process the public should be made aware of the benefits of non-motorised travel in terms of health, well-being, as well as time and cost savings.

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

The production of the maps will lead to a more long term and strategic set of interventions aimed at encouraging more walking and cycling. To date, KWT is of the

opinion that provision for walkers and cyclist has not been given sufficient attention and the Bill will therefore play a vital part in ensuring that local transport plans are more holistic and cater for all travel needs.

In terms of active travel to schools, highlighting routes will not be sufficient to instigate change; the routes will need to be fit for purpose and accessible. It will be essential therefore that the routes are maintained in such a condition that parents are comfortable in allowing children to use them. Highlighting footpaths without ensuring an active maintenance and improvement schedule will not achieve this.

Routes also need to be evaluated, the locations and nature of crossing points need to be assessed and highlighted and paths will need to be well-lit where necessary, clean and regularly patrolled if a known and established route to school. There is a clear resistance by schools to recommending particular routes and therefore information will need to be provided to parents from trusted independent sources.

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

This will be vital - otherwise the provisions of the Bill and the integrated travel maps will not lead to any real change. However, we have concerns that the Bill does not define 'continuous improvements' and that without guidance Highway Authorities, faced with severe budget pressures, will have the option to do a minimum set of improvements and still fulfil their requirements. If this provision is not strengthened, KWT is of the opinion that the Bill will not lead to a fundamental switch in the number of people walking and cycling.

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

This is essential and its inclusion as a provision in the Bill is an indication that Highway Authorities have traditionally been able to build new road schemes without considering walking and cycling provisions, despite the use of appraisal tools such as WelTag. Future assessments of road schemes should consider the needs of pedestrians and cyclists and this should include assessing the health benefits arising from the use of non-motorised travel.

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.

We did not submit a response to the consultation document but took part in various stakeholder events.

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

The Bill will be an important component of the wider aim and vision to encourage more people to walk and cycle as part of their every day travel. However, in its existing format with an emphasis on the production of integrated maps and no requirements to promote these widely, nor to meet minimum standards in terms of ‘continuous improvements’, then the Bill is unlikely to meet the ambitious long term vision set out in the White Paper consultation document.

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

As set out, the Bill does not address some of the likely barriers to the implementation of the Provisions in the Bill. These include the additional costs for Highway Authorities and the skills and knowledge required in providing for non-motorised travel. Of equal importance is the need to encourage the public to become involved in shaping the integrated travel maps. Without the involvement of communities, the emerging maps are unlikely to meet community needs and there will be no political push to ensure that existing routes are improved and new routes are developed in a way that will make a real difference.

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.

The Bill does not include Provisions that will result in any real increase in the demands on Highway Authority budgets. It is therefore likely, especially under the present economic climate, that Highway Authorities will adopt a ‘do minimum’ stance. And of course this will not lead to any substantial modal switch – so that the widespread social, economic and environmental benefits that could be generated as a result of increasing the number of pedestrian and cyclists will not be realised.

KWT is therefore of the opinion that the Bill needs to be more prescriptive and detailed in the way it will require Highway Authorities to fulfil the Provisions – and that the consultation process needs to encourage the widespread involvement of communities. This will have greater costs implications for Highway Authorities, but when considered within the wider costs involved in road provision, then the sums involved are not likely to be significant. A small switch in resources towards provision for non-motorised travel will result in a vastly greater array of benefits – to individuals, communities, local authorities and society as a whole. The Bill must seize this opportunity.

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?

Since the guidelines have not been published, we cannot answer this question at this stage. As set out, the Bill lacks detail on the exact duties that Highway Authorities will need to address. There is a danger that if the Bill is vague in the way it sets out the Provisions, then Highway Authorities will not rise to the challenges set out in the White Paper, even if further requirements are set out as accompanying guidelines.

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

There is no doubt that the *School Transport Topic* of the Eco-Schools Wales Programme is seen by schools as amongst the most challenging to undertake. Often schools themselves will admit to only modest success with this module, although generally speaking, Eco-Schools Wales pupils do receive road safety and cycling proficiency training via a variety of schemes. Schools are much more prepared to walk children to local events and active travel is included as an option when planning school trips. Those schools who have made changes are reporting improved attendance and punctuality through provision of 'walking buses' - and some schools report that these type of initiatives also improve attendance at school breakfast club.

Parental concerns have been expressed as to the supervised arrival of their children to school and many schools are addressing this concern via smart-phone app technologies to aid communications in such matters. Often it is not the journey to school that determines the pupils' method of travel, but the onward journey to work. Where the journey to work element is not present, or is undertaken using alternative transport to the car, we see schools reporting an increased number of pupils benefitting from active travel to school as a result of school-led initiatives. In spite of the successes schools have been achieving through one-off events, teachers do feel uncomfortable advising parents on alternatives to the car. There is clearly a feeling of not wanting to inconvenience parents, a lack of information regarding safe alternative routes and a paucity of further information about onward journey options. It is no coincidence that many Eco-Committees incorporate traffic management into their action planning.

Provision of suitable, secure bicycle storage is also an issue for many schools - both from a cost perspective and having adequate space for such facilities.