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e-mail response sent to: SeneddEIS@assembly.wales

Dear Sir/Madam,

Response to: The National Assembly for Wales' Economy, Infrastructure and Skills Committee is undertaking an inquiry into The Active Travel (Wales) Act 2013

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 spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The 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 contribute our views to the above Inquiry.

1.0 The Objectives of the Active Travel Act

- 1.1 RTPI Cymru fully supports the objectives of the Active Travel Act.
- 1.2 Many of the towns, cities and neighbourhoods in the UK and elsewhere most noted for the quality of their built environment are those where people can get around easily on foot or by bicycle. Active travel is a key component of 'liveable' communities.
- 1.3 The prevalence of motorised transport presents a continuing challenge to planners and other built environment professionals seeking to create the attractive, healthy, vibrant and sustainable places which most people aspire to live in.
- 1.4 In developing local infrastructure that supports daily travel by active modes and enables more people to shift from car use, the delivery of the Active Travel Act will strongly complement the role of the Welsh planning system under the Planning (Wales) Act 2015 and the Well Being of Future Generations (Wales) Act 2015 to facilitate and manage the use of land in the public interest and support sustainable development and improve air quality. It is essential that the synergy between the Act

and the planning system is recognised and articulated through the development and implementation of planning policy at both local and national levels.

- 1.5 In facilitating development, the planning system places additional demand on transport infrastructure and networks. Given the high proportion of daily journeys which are short and local, and the high proportion of short trips which are made by car, the provision of local active travel networks can provide very effective mitigation of development impacts. Therefore, it is incumbent upon the planning system and the development industry to play its part in supporting the delivery of the Active Travel (Wales) Act.

2.0 Disconnect between the Active Travel Act and the Planning System

- 2.1 The Active Travel Act is a laudable piece of legislation, but the narrow scope of the duty it confers upon local authorities represents a major flaw. Due to the way that the Act and supporting guidance have been framed, in reality the burden of meeting the duty has tended to fall mainly upon local authority transport and highway functions. Whilst these functions would always be expected to play a central role in meeting the requirements set out in the Act, a 'whole local authority' approach integrating the actions of key service areas (e.g. education) is arguably essential in order for the Act to have its intended impact. In this regard, it is significant that the Act makes no reference to the planning system in Wales and requires no specific contribution to the delivery of the Act by local authority planning functions. This is in spite of the considerable influence the planning system has in shaping the design and use of the built environment and local movement networks, and in creating many of the problems which the Active Travel Act sets out to remedy, mainly, by the retrofitting infrastructure.

- 2.2 This lack of a clear linkage with the planning system represents a major weakness in the Active Travel Act which arguably jeopardises its future success. The best means of filling this gap (and of avoiding any revision to the Act) is via a revision of planning policy, planning guidance and the delivery and design guidance for the Act. The comprehensive revision of Planning Policy Wales (PPW) currently being undertaken by Welsh Government represents an ideal opportunity to begin this process. In addition to a strengthening of PPW there should also be appropriate references included in Technical Advice Notes relating to development plans, transport and design

3.0 Strengthening Planning Policy

- 3.1 PPW was first published by Welsh Government in 2002. Since then it has undergone periodic content updates to reflect changes in related legislation and policy. However, its format has remained more or less the same.
- 3.2 The most recently-published update of PPW (edition 9, November 2016) represents the final edition of PPW in its established format. Welsh Government is working on a comprehensive revision of PPW to align it with the Planning (Wales) Act and the Well Being of Future Generations (Wales) Act 2015.
- 3.3 The current edition 9 of PPW, (in section 8.2, page 119) makes only factual references to the Active Travel Act. It recognises the desirability of encouraging active travel for short journeys, asks local authorities to take into account the requirements of the Active Travel Act and encourages the implementation of facilities to support cycling. However, it places no effective obligation upon the developers of land to support the delivery of the Act through their schemes.

- 3.4 If the planning system is to contribute to support delivery of the Act, the content and language of the revised PPW (expected Spring 2018) where it relates to Active Travel needs to be greatly strengthened. Provision for active travel through the development process must be made a central and essential requirement under the new document. It must not be something that can be regarded as optional or tradeable through negotiation, as is possible under the current version of PPW.
- 3.5 The strengthened policy would require all new developments to:
- facilitate the development and completion of routes shown on local Active Travel Integrated Network Maps (INMs);
 - integrate with local active travel networks as defined in the INMs; and,
 - contribute to the expansion and improvement of local active travel networks through the provision of well-designed facilities within development sites and facilitating off-site connections.
- 3.6 Policy must also ensure these provisions are reflected within Local Development Plans.
- 3.7 The requirements relating to development management also need to be strengthened. In determining planning applications local planning authorities must ensure that development proposals maximise their contribution to the objectives of the Active Travel Act through their design and supporting infrastructure. This is necessary as, too often, the provision of active travel facilities within new developments is prevented or compromised due to other considerations taking precedence. Where developments do manage to include provision, it is frequently the case that facilities are poorly-designed and do not adequately meet users' needs. This highlights the need for clearer guidance on design and professional training.
- 4.0 The need for improved design guidance to address the design of active travel facilities in new developments.**
- 4.1 The Active Travel Design Guidance published to support the delivery of the Act provides advice on the design of good quality active travel routes. Embracing many aspects of good practice in infrastructure design, it is a useful and comprehensive document. However, its weakness is that it relates mainly to the retro-fitting of facilities within the existing highway network. This makes it of limited interest and value to the designers of new developments and planning decision-makers.
- 4.2 The document is in the process of being reviewed and revised by Welsh Government. This presents the opportunity to broaden the scope of the document beyond retro-fitting so that it is also relevant and useful for the design of new developments and streets.
- 4.3 The revised version needs to provide advice that is relevant for active travel design in all situations. It must work for planners, urban designers and engineers and help to reconcile the conflicts which frequently arise in the place-making process between engineering and aesthetic considerations.
- 4.4 Wales has a great opportunity to take the lead in creating comprehensive Active Travel Design Guidance that can be used for designing infrastructure both in the existing urban realm and within new development schemes and settlements.

5.0 Funding and Developer Contributions

- 5.1 Active travel infrastructure should be provided as an integral element of new development. Where off-site connections are possible and required to provide non-motorised access to a development or connect it to other facilities, developers must be expected to contribute to this provision through a S106 planning agreement or an agreement under S278 of the Highways Act 1980.
- 5.2 Any future reforms of the Community Infrastructure Levy should consider mechanisms that could generate funding which could help to pool contributions for the development of wider local active travel network development and to match funding from local authorities' own capital budgets and Welsh Government transport grants.

6.0 Championing the Active Travel Act

- 6.1 Delivering the Active Travel Act in Wales is not just the role of local authorities. Success will require the concentrated effort and the collective commitment of multiple organisations and professionals across the public, private and voluntary sectors.
- 6.2 Welsh Government has a key role to play in harnessing and co-ordinating the energies, expertise and actions of the many actors involved.
- 6.3 The establishment of a central unit within Welsh Government, if properly resourced, could provide the mechanism needed to champion and co-ordinate the delivery of the Act. Its role could include integrating delivery of active travel across policy areas, promoting the Act across all sectors, providing advice to practitioners delivering the Act and working with professional institutions, the development industry, academia, NGOs and local advocacy groups to facilitate inter-disciplinary collaboration through training and professional development programmes.
- 6.4 It is also important that Welsh Government leads by example in the delivery of its own projects - by ensuring that any new transport, development or regeneration schemes with an active travel component which Welsh Government delivers itself are exemplars of active travel best practice.
- 6.5 While the new Transport for Wales will focus on public transport facilities and services there will be opportunities for those facilities and services to link to and support active travel provision. Recognising and supporting such opportunities should be a specific aim for Transport for Wales.
- 6.6 The RTPI has championed improved links between transport planners and spatial planners for some time to ensure an effective level of communication and joint working. Improved links could ensure active transport initiatives are given a growing emphasis.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



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