Cardiff Capital Region Regional Transport Plan

Response to the consultation from Cardiff Cycle City

Cardiff Cycle City welcomes the opportunity to comment on the draft Cardiff Capital Region (CCR) Regional Transport Plan. We strongly support the plan's general commitment to a more sustainable transport system in the CCR, with active travel playing a key role in this. However, we believe there are many areas where the plan underplays the potential of active travel and fails to make clear commitments to its development. It is vital that there is a concrete commitment to the delivery of effective active travel networks with clear undertakings to provide the required resources. We are deeply disappointed that the Net Zero Wales Carbon Budget 2 (2021 to 2025) target of 'increasing trip mode share of active travel from a current estimated proportion of 27% to 33% by 2030 and at least 35% by 2040' is not referenced in the plan. This is a key national target and cannot be achieved without an explicit commitment from the CCR to play a proportionate role in its achievement.

We note that the RTDP Scheme List orders interventions broadly in line with the sustainable transport hierarchy, with active travel at its head, yet the text in the body of the plan relegates active travel to last place. As you state on page 21, 'breaking norms is a challenge' and one of the key ways to meet that challenge is by normalising active travel as a key mode of transport. This document could play an important role in doing so, were it to prioritise active travel in the narrative.

There are also numerous examples of active travel being ignored when it clearly has an important role to play:

> Page 15 'The availability of frequent, reliable and affordable public transport is equally important for young people as it impacts on their ability to attend college, work and participate in leisure and social activities.' Active travel should be included alongside public transport
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> Page 29 'Currently, across the CCR, cars contribute considerably more to road emissions than any other vehicle, and the easiest and most effective way to mitigate and reduce this is to provide a bus service that is attractive, convenient and provides a real, useable alternative to private car use.' For shorter journeys, particularly in urban areas, active travel can be easier and more effective, given that revenue costs will be minimal.
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> Page 31 'TPO1 To improve access for all to employment opportunities and core services, ensuring new and existing developments are accessible by sustainable transport.
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> Strategic Activities
> 1. Prioritise investment in public transportation.'
> Given that the objective concerns sustainable transport, active travel, the most sustainable form of travel, should be included alongside public transport in Strategic Activity 1.

Page 34 TPO7 ‘To reduce greenhouse gas emissions, air pollution and noise emissions from road transport by 60% (CO_2) by 2035’. Active travel has enormous potential to contribute to the achievement of this policy. A commitment to developing active travel infrastructure and promoting its use should be included in the Strategic Activities.

Page 43 ‘PC1- Reduce the number of private car trips into the Region’s towns and city centres to address congestion and air pollution and improve the efficiency of our road network.’ There is no mention of active travel interventions under this policy despite the plan ostensibly setting out to achieve modal shift from the private car to walking, wheeling and cycling.

We welcome the commitment in the plan to improving accessibility to transport, and improved engagement with communities and accessibility organisations. We believe a practical demonstration of this would be a commitment to the removal of the physical barriers on active travel routes that currently deny access to many disabled people.

We welcome the individual references to e-bikes in the plan. We would like to see these expanded into a more coherent approach to this mode given its significant capacity to meet many of the objectives in the plan, were it properly supported. In particular the capacity of e-bikes to cope with distance and topography make them an ideal mode for increasing accessibility to places of employment. E-cargo bikes also offer significant potential to reduce the pollution and congestion caused by the dramatic increase in the number of home deliveries.

We fail to understand the reasoning behind the inclusion of the line on page 14: ‘active travel networks in some valley communities and rural areas are difficult to implement.’ There is no evidence that active travel networks are more difficult to install than other modes, in fact the reverse is generally the case. The region’s A465 road upgrades have been some of the costliest and most complex transport projects in the UK.

Turning to the specific active travel policies, we are deeply concerned at the possible implications of Active Travel Policy 1. The national Active Travel Act Guidance was put in place by the Active Travel Act to ensure that infrastructure was built to a standard that would encourage use and, above all, was safe. The flexibility in standards prior to the Act resulted in the provision of infrastructure that was not fit for purpose and consequently had no impact on modal shift. Transport for Wales has been given responsibility for updating the Active Travel Act Guidance and will continue to do so, providing Wales with effective guidance that already allows considerable scope to meet specific local needs.

With regard to governance, we would like to see specific reference to the inclusion of active travel user /advocacy groups in the Review Group that is being established.

Encouraging active travel among older people to extend their transport options, and support more active and healthy lifestyles is indeed important, but encouraging active travel earlier in life will make it far more likely that elderly people will be capable of enjoying the benefits of active travel.

We would like to see a much stronger commitment to demand management, for example by replacing the ‘may’ in ‘We may also need to consider ways to manage demand, through the consideration of options such as congestion charging, emissions charging and workplace

parking levy-type schemes’ on page 30, with ‘will’.

We welcome the commitment to update existing parking standards, we would like to see these strengthened to include specific undertakings to introduce maximum limits for car parking and minimum limits for cycle parking.

To meet the net zero targets by 2035, specific figures are given for private cars, hydrogen powered vehicles and EVs, but not for active travel and public transport.

We strongly support your proposal to roll out Moving Traffic Offence enforcement powers and would suggest that you add the ‘management of school streets’ as a reason for their implementation.

We agree that there is an urgent need to better integrate sustainable modes of transport and fully endorse your policy of supporting the provision of secure, pre-bookable cycle parking lockers at rail stations and transport hubs. We would recommend that greater consideration is given to integrating travel by bus and bike. Providing secure bike parking at bus stops and bus interchanges would greatly increase the number of people who could travel to a bus stop within reasonable travelling time.

We have concerns over your proposal PT7 - ‘Support opportunities for interchange between car travel and public transport through expansion of existing, and/or provision of new interchange provision at stations, that intercept the number of car trips early to improve the efficiency of the Region’s road network’.(p40) Given that this measure is targeted at shorter journeys, we would welcome an assurance that the provision of active travel infrastructure will be prioritised over this intervention.

Given the plan’s desire to reduce car use, the proposal in PC3 to ensure ‘that safe and secure parking is provided in well-lit areas, and is clearly identified in appropriate locations e.g., town and city centres, places of employment.’ seems to provide an open ended commitment to the provision of car parking for private cars. This is at variance with your statement in the penultimate paragraph of page 42. We also cannot understand how such a car centric policy could be rated as having a neutral impact on carbon emissions and modal shift in the scoring for your Integrated Well-being Assessment.

We support the proposal for ‘Careful consideration of wayfinding and signage, using inclusive language and imagery., but would strongly recommend that this is accompanied by a commitment to implement an effective system of active travel wayfinding and signage throughout the region.

We welcome the commitment to improve maintenance of active travel routes and to enhance design and construction of infrastructure so as to minimise the need for future maintenance. (p46) We would recommend that such work is undertaken in collaboration with TfW so that resulting benefits can be applied at a national level. The innovative suggestion of involving

Community Payback schemes in the maintenance and construction of active travel routes is worthy of consideration but will clearly need to be handled sensitively.

The effective promotion of active travel combined with behaviour change programmes will be essential in bringing about the model shift required by Llwybr Newydd and Net Zero Wales. We therefore welcome the proposal to develop packages to enable local authorities to carry out these activities. Once again, we would urge close cooperation with TfW so that good practice can be more easily shared on a national basis. The promotion of healthy lifestyles is both more important and more effective when targeted at younger people, we would therefore urge that the proposal to work with secondary schools on active travel facilities is widened to include primary schools.

We are concerned at the lack of clarity on prioritisation. There are several commitments to 'prioritise' in the plan, yet there is no definitive mechanism to determine how these competing priorities will be reconciled. The details provided on the use of the prioritisation tool are vague. The value of this consultation is undermined by the statement on page 57 that 'further information to support the prioritisation process, in terms of deliverability, affordability and management.' will only be available after the consultation has closed. We are also deeply concerned at the decision to exclude quantitative data from the assessment process. This is in effect a rejection of evidence based policy making.

We are also concerned at the lack of clarity over which bodies will be responsible for the delivery of active travel programmes. Appendix 1 lists CCR as a delivery body for five of the six active travel policies. Does this mean that the CCR will be establishing its own active travel unit? We note that TfW is not listed as a delivery body for the first five policies. We would recommend that, given the expertise it has developed in training and design, TfW be included as a key delivery partner.

With regard to the Monitoring and Evaluation Plan we would like clarity on the continued publication of investment by mode in order that the level of investment in active travel can continue to be tracked over time.

About Cardiff Cycle City: Cardiff Cycle City was established in January 2014. We bring different individuals and groups together in one common vision: to make Cardiff the best cycling city in the UK. We aim to work constructively with Cardiff Council and other agencies to bring this about. We have over 1000 registered members and supporters, and an extensive reach through our social media channels.