

The third cycling and walking investment strategy (CWIS3)

Cycling UK's response to the Department for Transport's consultation

Our detailed response is set out in this document alongside an executive summary emphasizing our key points for consideration by the Department for Transport (DfT) and Active Travel England (ATE).

Summary

Cycling UK welcomes the consultation on the Third Cycling and Walking Investment Strategy (CWIS3) covering the period from 2025 to 2030.

We are, however, concerned that the draft CWIS3 is too passive and lacking in a clear method of delivery. We make two substantive recommendations to improve the strategy: to include a narrative theory of change throughout the document and to tighten its objectives.

Firstly, it lacks a theory of change. There is no analysis of the problems and opportunities the strategy seeks to address. There is no outline of the issues/themes by which the strategy will achieve its objectives and outcomes. This results in a document that lacks a clear sense of direction and lacks presentation of the broad activities that will be undertaken to achieve the change and be held accountable to. For instance, the long-term national vision is passive, over ambitious and jargon heavy. It needs to be active, believable and in plain English. We do, of course, strongly welcome the inclusive element "for everyone" in vision. The strategy should present a narrative throughout that:

1. **Sets out the scale of the problems the country faces** that active travel can help to address, including, for example, physical inactivity, road danger, noise pollution, air pollution, carbon pollution and urban congestion.
2. **Describes the opportunities active travel can unlock** for the country, from a lower cost of living and better health to a better environment, a better quality of life, and boosted urban economic productivity ('decongestion').
3. **Explains how the strategy will 'intervene' to address the problems and unlock opportunities**, through, for example, weighting the majority of its investments into active travel infrastructure through Local Transport Authorities (LTAs), influencing new development and wider government and agency activities; alongside the social infrastructure and behaviour change programmes that deliver the confidence, skills and cultural shift supporting more people to walk, wheel and cycle everyday journeys.

Threading these three elements throughout the narrative of the strategy would substantially strengthen its sense of clarity, purpose and vision, helping to make a

persuasive case for the strategy, its investments and the action stakeholders need to take to support it.

Secondly, the objectives need to be more specific. While the draft objectives aim in the right direction – to make active travel safer and perceived to be an easy choice – we are concerned they are missing specificity, measurability, achievability and realism given the resources available over the timeframe proposed. The objectives should:

- **include a strategic output target and corresponding KPI for high quality cycling infrastructure built:** This should be a realistic but stretching figure for the infrastructure built in the CWIS3 period with the funds available. This would focus minds and draw stakeholders together to focus on delivery, recognising that high quality infrastructure makes the most difference to cycling participation and safety, and is the best, long-term return-on-investment.¹ The vast majority of walking improvements would also likely be delivered through the same funding, but it is vital to recognise the distinct nature of cycling infrastructure explicitly. This would be owned by ATE, supported by the DfT and government, delivered in partnership with LTAs. While we recognise such a KPI exists in the draft for LTAs¹, it should be a core objective that ATE are held accountable for.
- **Include a strategic outcome target and corresponding KPI to close the gender gap in cycling:** Many of the interventions that will increase cycling among women will improve and enhance the experience of cycling for all. The latest figures for 2024, for example, show that men made almost three times as many trips (23) as women, traveling 4.5 times the distance (87 miles) on average.² To this end, a target to close the gender gap in cycling should be a key outcome of the strategy that is measured through the KPIs. Tracking this will be a good proxy for the overall enhancement in the quality and experience of cycling in England. Achieving this, for instance, will also require the definition of 'high-quality cycling infrastructure' would need to include measures of 'social' or personal safety as well as 'road safety'.

Further detail is set out in response to the consultation questions below.

¹ Proposed LTA's performance indicator three: "increase in miles of compliant new/improved active travel network delivered"

Long-term National Vision

Question 1: Do you agree or disagree with the proposed national vision for active travel?

- Disagree

Question 2: If you disagree, why do you disagree with the proposed national vision for active travel and what potential alternatives do you suggest?

- We welcome the long-term national vision's focus on making walking, wheeling and cycling a safe, easy and accessible option for everyone, particularly its emphasis on inclusion.
- The proposed draft is, however, too passive. The phrases "the government wants" and "if they choose" weaken the vision. It should be active, recognising the significant influence and power government has, for example, to direct investment, guide design, provide political leadership which ultimately shape the 'choice environment.'
- We are concerned the vision of achieving a safe and welcoming built environment and cultural shift that allows everyone to walk, wheel or cycle by 2035 is unrealistic, given the funding available for the corresponding spending review period (£616 million SR; £154 million per annum; or £2.60 per capita per annum). Without significant additional sums, and mechanisms to 'crowd in investment' from other agencies and devolved authorities, the vision is unlikely to be achieved in the timeframe. The IPPR's "*Stride and ride: England's path from laggard to leader in walking, wheeling, and cycling*" (2024) recommended at least £2billion a year is needed by 2030.³

CWIS3 objectives

Question 3: Do you agree or disagree with the objective: 'Ensure people are safe to travel actively'?

- Disagree

Question 4: If you disagree, why do you disagree with the objective: 'Ensure people are safe to travel actively' and what potential alternatives do you suggest?

- Our primary concern with both objectives is that they are not specific, measurable, achievable, realistic nor timebound. While we welcome the direction of the objectives towards safety, it would be hard to say if progress towards this was being achieved, whether efforts to achieving it needed to be ratcheted up or what milestones along the way were being met.
- The previous Cycling and Walking Investment Strategy (2022) contained four measurable, specific and timebound objectives for 2025.
- We would welcome more objectives, more tightly focussed on distinct priority outputs and outcomes from the strategy, including: increasing

walking and cycling rates, as well as specific objectives for different target demographic groups where the benefits are significant, for example, children's active travel and increasing active travel among those with lower levels of physical activity generally – where there are significant health benefits.

- Regarding an outcome, we impress upon the Department the need for a unique objective for addressing cycling's gender gap – both increasing cycling overall while narrowing the gender gap between men and women. For 2024, men made almost three times as many cycling trips as women, traveling 4.5 times the distance on average.⁴ Addressing the gender gap in cycling is a strategic indicator of the overall quality and quantity of the country's cycle network and inclusive cycling culture.
- The strategy could then provide similar objectives for walking and wheeling – particularly increasing rates of walking and disability inclusion in walking.
- The CWIS3 safety objective should reflect a commitment to Vision Zero for walking, wheeling and cycling, with milestones towards achieving this mapped out against the CWIS periods.
- The CWIS3 should also contain an objective to work with LTAs and partners to enhance and extend the National Cycle Network (NCN), recognising the DfT's unique facilitating role in the national project and the Secretary of State's Powers to create or amend Public Rights of Way. Given the NCNs strategic, cross-boundary nature it is right that the Secretary of State and Department for Transport retain a coordinating and guiding role in its enhancement, development and extension.

Question 5: Do you agree or disagree with the objective: 'Ensure people feel it is an easy choice'?

- Disagree

Question 6: If you disagree, why do you disagree with the objective: 'Ensure people feel it is an easy choice' and what potential alternatives do you suggest?

- While we welcome the principle of making active travel an easy choice, as stated in response to question 4, our primary concern is that this objective will be difficult to measure and judge progress against. It will need to aggregate multiple measures for walking, wheeling and cycling, which include a diverse range of mobilities within each, while also needing to define 'easy choice.'
- Similarly, while there are draft objectives relating to 'safe' and 'ease', accessibility is not threaded through from the long-term vision to the

objectives and should be included as a particular line. Accessibility was also lacking in the previous CWIS.

- We would suggest wording around people's confidence walking, wheeling and cycling built upon a suitably robust KPI. Our concern is in finding a suitable survey method that is suitable sensitive to changes in perceptions of safety, confidence or ease walking, wheeling or cycling.

Performance Monitoring

The draft CWIS3 sets out three sets of proposed KPIs to look at trends at the national level, local level and performance or effectiveness of Active Travel England.

Question 7: Do you agree or disagree with the proposed key performance indicators?

- Disagree

Question 8: If you disagree, explain why.

- The lack of a theory of change throughout the document make it hard to comment on the chosen KPIs.
- For example, we very broadly welcome the indicators, particularly the road safety risk measure (KSI per billion miles). However, without a Vision Zero objective and a theory of change behind it that would guide progress on this KPI, we are left assuming that CWIS3 infrastructure and behaviour change initiatives contribute to KSI risk reduction.
- We believe there should be an indicator to close the gender gap in cycling participation and rates – given its strategic value in demonstrating the extent to which the quality of the experience of cycling has improved.
- In November 2023, the Public Accounts Committee's criticised the Department for Transport for a lack of transparency over the impact of previous active travel spending, as such CWIS3 should learn the lessons in setting clear, measurable targets that demonstrate its effectiveness. One such target is the construction and renewal of infrastructure that enables safer, easier walking and cycling.
- There should be national performance indicators for infrastructure built, improved or maintained, given this is the main output by which the strategic outcomes will be achieved and the success of the CWIS and ATE judged. It is right that ultimately ATE and the Department remain accountable for this output, finding ways to deliver in partnership with local authorities in a similar way to Transport for London's working with the London Boroughs, or Transport for Greater Manchester work with the constituent authorities.

Question 9: Do you agree or disagree with the proposed approach to performance monitoring of LTA outcomes frameworks using the performance indicators outlined?

- Disagree

Question 10: If you disagree with the proposed approach to performance monitoring of LTA outcomes frameworks using the performance indicators outlined above, explain why.

- We support the framework-led approach to monitoring LTA activity.
- While there is a risk-based safety measure at a national level, this should be included at the local level. For example, using a denominator for activity on the number of KSIs to better understand relative risk rather than absolute casualties (which could be reduced by reducing activity). This would provide a more accurate measure of road risk at the LTA and highlight any concerning trends or regional disparities in road risk.
- At a local level, there is a need for a KPI that recognises the value of small-scale schemes or 'non-linear' outputs that may not contribute additional miles, but still contribute significantly to enhanced active travel rates, broaden participation and enhance safety. For example, a major junction scheme, a number of small crossings, or policy decisions (i.e. traffic restrictions or congestion charging). This could take the form of a measure of number of critical issues removed/overcome on the road network.
- We would also support an output-based measure, for example, growing the proportion of the population of an LTA within reach of the active travel network, this would demonstrate effective investment in growing the availability of the active travel network to the population.
- Similarly, there should be a 'good state of repair' indicator for existing or legacy infrastructure, ensuring maintenance of the active travel network is prioritised.
- There may be value in creating an 'investment efficiency' indicator that tracks the proportion of DfT funds that go directly to construction costs. Such cost transparency is commonplace in the rail industry, for example, and measures what the proportion of costs that go on direct outputs (i.e. construction or behaviour change activities) versus indirect costs (back office functions, development work). Tracking these measures highlights areas for efficiency improvements and could, for instance, contribute to ATE's capability ratings.

Question 11: How can ATE support local authorities in delivering local targets?

- We encourage ATE to develop a standardised monitoring and evaluation tool kit, so that Local Authorities can be more efficient in the development and delivery of local monitoring, which would in turn enable ATE and the DfT to aggregate data from local schemes to determine the national impact of DfT funded / supported schemes.

Question 12: Do you agree or disagree with the indicators relating to the work of ATE?

- **Disagree**

Question 13: If you disagree, explain why.

- The KPI for active travel capability ratings should be 'maintained or improved' to give equal focus on maintaining highly capable LTAs alongside capacity building in others.
- As stated previously, we believe ATE should own an output KPI for high-quality infrastructure built, focussing ATE on the clear task at hand. A quantity measure alongside the proposed quality increase measure.
- The DfT should consider a KPI for service of satisfaction with ATE from LTAs to judge the success of its partnership with local and combined authorities.
- While challenging to develop, the DfT should also consider an outcome KPI for the planning system that seeks to track ATE's influence on new developments. For instance, seeking to understand whether new development contributes meaningfully to the extension of the active travel network, and thus increases in active travel levels.

Question 14: Do you have any other comments?

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Further detail is set out in response to the consultation questions below. Lastly, the consultation survey is particularly narrow in requiring respondents to disagree with statements in order to provide further comments. Given the nuances in organisational responses, we would have welcomed Likert scale with the option to provide comments even when we supported a feature. Our response seeks to provide constructive feedback rather than simply 'disagree.'

¹ Pellicer-Chenoll, M., Anton-Gonzalez, L., Villarrasa-Sapina, I., Devis-Devis, J., Gonzalez, LM., Pans, M. (2025) Effects of building cycling infrastructure on bicycle use: Differences by gender through a longitudinal natural experiment study, Research in Transportation Economics 110, 101531, <https://doi.org/10.1016/j.retrec.2025.101531>

² Department for Transport (2025) NTS 2024: Active travel

³ Singer Hobbs, M. and Frost, S. (2024) Stride and Ride: England's path from laggard to leader in walking, wheeling and cycling, IPPR, available at: <https://www.ippr.org/articles/stride-and-ride> (last accessed 19/11/2025)

⁴ Department for Transport (2025) NTS 2024: Active travel