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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Active Travel Act Guidance

June 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

The Active Travel Act Delivery and Design Guidance were originally published in 2014 as separate documents.

A new document combining the two separate sets of guidance, and including revisions to take account of changes in regulations was published in draft in February 2020 for consultation. This built on extensive feedback from stakeholders on the original guidance.

The consultation document and draft guidance can be found here <https://gov.wales/active-travel-guidance>

In February and March 2020 three consultation events took place; one in Carmarthen and two online (due to Covid-19 restrictions).

The consultation was promoted widely via the Active Travel Board, professional associations, public sector bodies, voluntary sector stakeholders and by Welsh Government's website and social media channels. Attention was also drawn to the consultation through TfW's Access and Inclusion panel. Due to the nature of the guidance being largely a technical manual aimed at agencies who deliver active travel infrastructure, it was not considered relevant to directly target children and young people.

The consultation closed on 19 June 2020.

This document summarises the main points from the consultation. When the finalised Guidance is published a summary of changes will accompany it.

Enquiries

If you have any enquiries please contact us at: activetravel@gov.wales

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Why is the Active Travel Act Guidance being updated?

The current Guidance has been used by local authorities and others involved in planning and designing active travel routes and facilities, and fulfilling the wider duties imposed on local authorities by the Active Travel (Wales) Act 2013 for a number of years. WG ran feedback workshops with users and wants to improve the guidance, drawing on this user experience. Since the publication there have also been a number of regulatory changes that are relevant to the design of active travel infrastructure, which are reflected in the revised guidance, such as changes to the Traffic Signs Regulations and General Directions.

Purpose of consultation

The main changes to the Guidance which were consulted on are as follows;

Part 1 – Delivery

- Reflecting changes in law and policy
- Highlighting how it relates to different local authority functions
- Introducing Active Travel Network Maps (ATNM), which bring together the Existing Routes Maps (ERMs) and Integrated Network Maps (INMs)
- Greater clarity on mapping active travel routes outside designated localities
- Greater clarity on consultation and engagement expectations
- Clearer emphasis on the objective of achieving modal shift from car to active travel

Part 2 – Planning and Design

- Expanded consultation and engagement chapter
- Changes to design elements following revised TSRGD and drawing on new best practice
- Changes to cycle flow volumes associated with width requirements for cycle tracks

Consultees were asked to provide responses against a set of standardised questions which were designed to capture feedback against the main areas where the Guidance had been amended.

Responses received

A total number of **64** written consultation responses were received. Of these, 22 were from public sector organisations, 3 from private sector organisations, 7 from third sector organisations, 9 from voluntary organisations and 22 from individuals.

1 consultee responded in Welsh, 63 responded in English.

Appendix 1 provides a list of consultees, other than those who asked for their details to be kept anonymous.

Three consultation events took place in February and March 2020, one was held face to face and the other two took place online using Microsoft Teams.

A number of organisations submitted detailed responses in addition to answering the consultation questions;

Cardiff Cycle City
Cardiff Cycle Campaign
Carmarthenshire County Council
Ceredigion County Council
Cycling UK
Ramblers Cymru
Sustrans
Wheelwrights

Summary of consultation responses, question by question

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?

Agree : 33
Disagree : 8
No comment : 21

Summary of responses

The majority view agrees that the merged document provides more cohesiveness and equality of status for the delivery and design elements of the guidance.

Several responders commented that the document length is daunting which could be off-putting both for technical audiences who are looking for something specific but also non-technical audiences. Others called for an easy read version suitable for people with disabilities. There were suggestions to change the document to being electronic to make it easier to interrogate. Several responders pointed out typographical errors, layout inconsistencies, spelling mistakes, and poor resolution images.

Some felt there remains some duplication within the guidance, especially the two chapters covering engagement and consultation.

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?

Agree : 20

Disagree : 12

No comment : 25

Commented but neither in agreement or disagreement : 7

Summary of responses

The proportion of consultees who did not answer this question suggests the premise was not necessarily clear, or is not a priority issue for people.

A strong theme coming from comments was that further emphasis on behaviour change interventions, promotional campaigns and links with other policy areas is vital if mode shift towards active travel is to be achieved. Several said that there is inadequate buy-in and understanding from senior leaders within local and national government to bring about change, and that they did not think the Guidance would make a difference without this. Several people suggested training was needed across multi-disciplinary teams.

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

Agree : 35

Disagree : 4

Potentially agree : 4

Commented but neither in agreement or disagreement : 8

Did not answer : 13

The vast majority of consultees agreed with the proposal to combine the ERM and INM maps to form one Active Travel Network Map showing existing and future routes together.

There were several comments on the importance of existing and aspirational routes being clearly distinguishable, and that public facing versions of these maps should be formatted differently to the formal record of routes maintained by local authorities. Concern about the accessibility of maps for people with visual disabilities was raised.

Those who were against the suggestion had concern that too much information on the map could make it confusing to members of the public. One consultee thought the focus on maps is a distraction from in-depth promotional activities which are more needed. Some consultees said it is not appropriate to combine both walking and cycling information adequately on these maps and further consideration should be given to how to better present the walking network.

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?

No comment = 24
Made a comment = 40

Consultees made the following suggestions for where the Active Travel Guidance should have stronger links to other policy areas;

- Environment (Wales) Act – section 6 is referenced but other links between the two policy areas should be enhanced. Furthermore, although the AT Guidance references the Environment Act within the policy chapter there is no further development through the practical sections of the Guidance to demonstrate how
- Further updates to reflect recent Sustainable Urban Drainage regulations
- Public Health (Wales) Act 2017
- Link active travel in with the imminent duty on public bodies to undertake Health Impact Assessments in specified circumstances
- Social Service and Wellbeing (Wales) Act and its national outcome framework
- The revised Wales Transport Strategy (WTS) should drive change towards sustainable and active travel. Therefore the ATA Guidance and other transport policy e.g. Road Safety Framework and Learner Travel Measure should flow from the WTS and not be republished until the WTS is finalised
- Transport guidance does not refer to active travel sufficiently – including WeITAG
- Air Pollution policy. Active Travel routes should not go through areas of high pollution
- Stronger links to Education policy and particularly 21st Century Schools/Modernising Education
- Better links with local air quality management plans
- Action on Disability : A Right to Independent Living
- Better integration with Rights of Ways Improvement Plans
- Use of Street Works permit schemes

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?

7 consultees said they had no opinion

21 left this question blank

36 comments were made.

A majority of consultees welcomed the clearer list of responsibility across local authority and Welsh Government functions. Some consultees commented that until clearer action across Welsh Government showing leadership on Active Travel happens it is unrealistic to expect change at a local government level.

In the context of enabling more effective local governance, more than one consultee pointed out that better engagement with people with physical and learning disabilities would help achieve this.

Other points made by consultees included:

- The City Region/City Deal areas should have explicit responsibilities
- Better collaboration between local authorities and between authorities and Welsh Government is needed
- Public Service Boards should have a role scrutinising Active Travel plans, from a multidisciplinary perspective
- More than one response said that Local Authority corporate leadership is needed and that whilst Active Travel remains responsibility of highways no progress will be made. The Active Travel Guidance is still seen as being aimed at Highways departments and is therefore not influential
- The table of responsibilities should also include inclusive design as a responsibility of Planning and Development departments
- More than one response said that attitudes towards active travel across local authority departments needs to change in order for progress to be made
- A role for WLGA in push the message across LA divisions would be helpful and also references to the role Transport for Wales has.

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)

Yes = 10

No = 5

Maybe = 18

Not answered = 18

No opinion = 13

This question assumed a level of knowledge and understanding about the technical aspects of the Active Travel guidance and may explain why almost half of responders did not have an opinion or left the answer blank.

Of the 5 who do not believe mesh density to be a useful term in defining what constitutes an active travel network, the concerns ranged from thinking that the concept is overly complicated, to concern that some topography e.g. Valley towns would not be suitable. One responder was concerned that the inclusion of 20mph zones in what constitutes an active travel network is not acceptable. Another was concerned it could lead to additions of superfluous routes which are poorly used.

The following points were made by those responding maybe or yes to the question;

- Several made the case that the mesh density for walking and cycling should be different
- Mesh density is less important than route continuity
- Whilst welcoming the idea for urban areas, urban fringes and small towns would not be suitable for this level of route density several people argued especially where narrow streets or valley topography limit options
- Suggestion for the Guidance to include case study examples for what 250m network density would look like in different urban settings
- Request that other sections of the guidance are updated to refer to the concept and practicality of achieving it
- Concern of ambiguity in that the guidance elsewhere says authorities may focus on serving key areas e.g. schools, which would suggest mesh density across the network is not a serious ambition
- Several responders suggested that the digital ATNM GIS system should contain a tool which enables an assessment of network density.

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?

Yes = 9

No = 4

Maybe = 5

Not answered = 20

No opinion = 26

This question was not answered by the vast majority of responders, many of whom are not in job roles that have responsibility for fulfilling statutory duties.

Of those who commented the following suggestions were made;

- Network planning being an iterative process and the network planning sections needing to give clearer advice on the incremental approach recommended
- Concern that the consultation responsibilities are too onerous for local authorities and that without sufficient additional resources are not achievable

- A number of people suggested streamlining the guidance to make it easier to understand and therefore more likely to be followed
- Whilst the Active Travel duties are clear some responders said other duties relating to the Environment Act and how it applies to active travel are not clear enough
- Requests were made for practical examples of how non-transport focused departments within local government can comply with the duties of the act
- Tighter clarity on measurement of increased active travel take up to measure effectiveness of interventions was mentioned
- Several responders highlighted some terms within the document which they suggested weakens the guidance e.g. “should” rather than must

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

Made a comment = 37
 Said they had no comment = 4
 Left blank = 23

Points made in response to this question included:

- Further emphasis on walking and modal shift
- Strengthen the sections on how active travel dovetails with health policy
- Include details about good practice for behaviour change projects and revenue funding interventions especially around schools and school travel.
- Remove conditions relating to smaller settlements and rural networks
- Provide additional support and advice for EqIA's and on-going training for a range of users of the guidance (planners/highway officers/etc)

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?

Yes = 10
 No = 12
 Maybe = 3
 Not answered = 21
 No opinion = 18

This question was not answered by the vast majority of responders.

Of those who responded with comments these included;

- For the Active Travel Guidance to be updated regularly when

amendments are made to TSRDGD and also the Highway Code update

- Request for additional design details on side road junction priority measures, use of low traffic neighbourhoods, innovative roundabout design
- Concern that the culture of highways design in Wales will continue to favour motorists over walkers and cyclists
- Suggestion that the provision of some vehicle physical speed restraint measures on roads may result in increased pollution and make cycle journeys uncomfortable and inconvenient
- Concern that subjective interpretation is still prevalent, particularly in relation to use of tactile paving for example
- The opinion that unless the planning system is tighter in its approach to pushing the importance of active travel there will be limited impact

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?

Yes = 22

No = 10

No comment = 6

Not answered = 26

Again a large number of consultees did not answer this question or said they had no comment to make.

Those who do not consider this change to be a good idea pointed to concerns about the impact on disabled users of shared paths. Some suggested more use of alternative provisions to keep cycle lanes on the highway wherever possible thus avoiding shared use tracks. Others asked for the sections in the guidance to be strengthened where it stipulates that alternative provision should be provided for walkers and cyclists to avoid conflict between users. Incorporating additional green infrastructure and sustainable drainage was also quoted as a reason not to reduce widths of routes.

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?

Provided a response = 35

Stated they had no comment = 10

Not answered = 19

The following suggestions were received;

- Use of angled kerbs within cycle tracks
- Further details regarding sustainable urban drainage and other environmental mitigations
- Suggestion of a collaboration to develop and trial bespoke solutions for difficult layouts, as a way of sharing good practice and developing confidence of using innovative solutions
- Additional design details for junctions and crossings generally, and specifically for two way cycle track junction designs, and transition from one way to bidirectional cycle tracks
- Further examples of shared use path layouts, accepting that these will continue to be the optimal solution in areas of limited population
- Further design details to be added once UK Government's review of Highway Code is complete (as appropriate)
- Priority traffic filter lights for pedestrians and cyclists and inclusion of guidance on using traffic light programme to disrupt the flow of highway traffic which exceeds speed

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?

Confident = 26

Stated a lack of confidence = 15

Said they had no comment to make = 7

Not answered = 16

There was general agreement that the guidance needed to be strengthened in this area. In relation to whether the specified EqIA process will make a difference to enhancing the quality of schemes and reducing conflict between users, the following comments were received:

- The EqIA process mustn't become over generic and lose sight of specific genuine local needs
- One size doesn't fit all – concentration on the formal EqIA may displace early meaningful engagement with groups representing people with protected characteristics which would be a mistake
- Concern that the blanket requirement will slow down the implementation of potential straight-forward AT improvements and therefore a request for additional guidance for small scale schemes which outlines a lighter-touch approach

The following other points were made:

- Suggestion that Health Impact Assessments sit alongside EqIA as a method of engaging users to inform scheme design

- More support to be provided to LAs in how to undertake meaningful EqIAs for Active Travel. It was noticed that Appendix J was missing from the consultation document.
- EqIAs as a method of promoting Active Travel will help to diversify take up

Q13: Chapter 20 on Monitoring has been expanded to give more specific guidance and includes a template. Does this provide sufficient clarity?

Yes / maybe = 25

No = 8

Not answered/no comment = 31

Comments received in relation to this question included:

- For monitoring of travel to secondary school, the School Health Research Network's biennial health & wellbeing survey was recommended for inclusion as one of the resources LAs should use
- A call for additional content regarding evaluation and analysis of data
- Call for removal of repetition within chapter 20 and improved clarity relating to outcomes and impacts
- More explicit reference to how LAs should use the active travel related data sources which are available
- Provision of worked examples and additional tools to guide LAs in how to monitor and evaluate engagement, co-production and increased mobility
- Consider providing route user survey template as an appendix
- Consider requiring local authorities to develop their own modal shift targets

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

Provided a comment = 23

No comment to make = 11

Left blank = 30

Several consultees provided very detailed comments of a largely technical nature. When the guidance is finalised Welsh Government will include a list of changes which have been made as a result of comments received.

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

No response = 40

Provided a response = 24

Several of those who commented thought there is good potential for active travel signage, maps, wayfinding, interpretation boards etc. to make a positive contribution towards achieving Cymraeg 2050. Suggestions included using active travel to pilot mono-lingual (Welsh only) place name signage and digital services e.g. an App to report problems with routes. These could be progressive ways of enabling people to use Welsh for everyday reasons, and would be easily accessible for Welsh learners.

Suggestions were made that the Active Travel Guidance, due to its technical complexity, should be at an 'accessible' level of Welsh to encourage more people to refer to it if Welsh is their second language or as a learner.

A small number of those commenting disagree with Welsh language policy ambitions and criticised use of active travel funds going towards translation, and said active travel signage should not use Welsh names because of the space it takes up on small signage panels.

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 favourably 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 favourably than the English language.

Did not answer = 48

Provided a comment = 16

Of those who commented, several repeated their response to question A above, for example some saying how adopting Welsh only place names on active travel signage would be a positive step, with others saying bi-lingual signage is confusing and should be English only.

One consultee said that the chapters relevant to engagement and consultation do not make an explicit reference to the requirement for public consultations to be in both languages and asked for this to be added.

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:

38 responses were received

A theme running through several responses was that walkers and cyclists are too often treated in the guidance as a homogenous group. Several people felt that the needs of walkers are not adequately addressed in the guidance for example the impact of windy conditions and avoiding air pollution hotspots are not mentioned as factors when planning walking routes. Another view was that the guidance indirectly discriminates against older people by not adequately catering for their needs as pedestrians.

More than one responder made the case against a narrow definition of active travel to the exclusion of leisure, citing how encouraging leisure walking and cycling can be the first step towards people becoming more confident to try it for local journeys. Further responses made a case for the Guidance needing to emphasise more strenuously the aim of halting the growth of motor traffic.

Several suggestions for updating the walking audit tool and cycling audit tool were received, including making them less subjective and having a different version for less dense urban areas. Others called for the tools to be simplified.

One responder said not enough emphasis within the guidance is given on ongoing maintenance of active travel infrastructure. One responder said not enough follow-up is done to check active travel infrastructure schemes achieve their intended outcomes and learn from where they haven't.

Some felt the Guidance needs to acknowledge the proliferation of electric scooters, and the issues created by this whether they are considered an active travel mode or not. Others pointed to not enough recognition of the requirements (widths, turning areas etc.) for mobility scooters which are a legitimate active travel mode.

Problems with the planning system not adequately addressing and enabling active travel enhancements were made. One consultee suggested the principle of 'no worsening' of AT provision needs to be adopted by Welsh Government.

Comments were received about the opportunities presented by the Covid-19 pandemic to installing solutions which enable social distancing, but could be retained as permanent active travel enhancements.

A request was made for Welsh Government to make more of promoting active travel through play, including guidance on temporary street play areas.

More than one consultee made representation about the document not being accessible for all its readership, particularly as the pdf format is not compatible with all screen readers.

Some responders used this space to offer typographic and spelling corrections and missing hyperlinks. There were also calls for an executive summary and summary document aimed at non-technical audiences.

The consultation heard from several individuals, third sector and voluntary groups who used the opportunity to draw attention to specific examples of bad practice where walkers and cyclists needs have been ignored or compromised.

In addition, very detailed commenting of the guidance chapter by chapter were received from:

- Carmarthenshire County Council
- Ceredigion County Council
- Cycling UK
- Sustrans
- Cardiff Cycle City, Cardiff Cycle Campaign and Wheelwrights.

Welsh Government is grateful for the time spent by these organisations and their comments have been taken into account in the final editing of the document.

Actions

Welsh Government will include a list of substantive content amendments made to the final version of the Guidance for ease of reference to make it easier for stakeholders to note differences from the version which was published for consultation.

Appendix A

The following organisations submitted consultation responses:

Age Cymru	All Wales People First	Association of Local Government Ecologists
Atkins Ltd	Beicio Bangor	Bridgend County Borough Council
Caerphilly County Borough Council	Cardiff and the Vale Bus Users	Cardiff Council
Cardiff Cycle Campaign	Cardiff Cycle City	Carmarthenshire County Council
Carmarthenshire Cycling Forum	Ceredigion County Council	Cycling UK
DECIPHer, Cardiff University	Flintshire County Council	Friends of the Earth Barry & Vale
Guide Dogs Cymru	ICE Cymru	Isle of Anglesey

& RNIB		County Council
Leonard Cheshire	Living Streets Cymru	Merthyr Tydfil Heritage Trust Ltd
Morgan Sindall Construction & Infrastructure Ltd	Natural Resources Wales	Neath Port Talbot Council
Pembrokeshire Coast National Park Authority	Penarth Town Council	Play Wales
Powys County Council	Public Health Wales	Rhondda Cynon Taf CBC
Ramblers Cymru	Rossett Focus Group	RTPI Cymru
Sustrans Cymru	Swansea Council	Torfaen County Borough Council
Vale of Glamorgan Council	Welsh Government	Wheelrights

The following individuals submitted consultation responses:

Stephen Aldridge	Martyn Fairlamb	Dafydd Griffiths
David Hancock	Philip Hartwell	John Holiday
Keith Ingram	Mr J. Jones	Brett Kibble and Cllr. Jill Kibble
Denise Mather	Gill Peterson-Flynn	Stephen Sims
Steve Waters		