

## **CONSULTATION ON THE ACTIVE TRAVEL DESIGN GUIDANCE, DELIVERY GUIDANCE AND ACTION PLAN**

### **Response Form**

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### **A. Consultation – Design Guidance**

#### **General Questions**

**Question 1: Do you support the approach to active travel routes and facilities that has been taken in the guidance?**

Yes

**Question 2: What will be the impact of this guidance on you, your organization, and/or the people your organisation represents?**

The guidance is likely to require investment to upgrade routes and facilities on NRW managed land if identified as part of Active Travel routes and networks.

The guidance is likely to require NRW to be more proactive in seeking opportunities for appropriate Active Travel provision through its advisory role, e.g. in relation to planning applications and road scheme consultations, which may require increased resources and/or skill development within the organisation.

**Question 3: Is there anything that you feel is missing from the guidance, or should not be included?**

Reference to and guidance on assessing impacts on the natural environment and landscape distinctiveness, and on improving the quality and distinctiveness of these elements through active travel design.

Guidance on understanding how to translate the evidence around barriers to walking and cycling into active travel design solutions, particularly for hard to reach or new audiences for active travel.

**Specific Questions**

**Question 4: Is the status of the document clear and how it interacts with other guidance documents such as the Design Manual for Roads and Bridges?**

No. There is scope to clarify and strengthen the document as outlined in the response to the delivery guidance (see the next consultation response below).

**Question 5: Does the design guidance clearly and fully define the needs of walkers and cyclists?**

Yes in broad terms, but further work may be required to inform solutions and approaches for particular geographical communities or specific target groups. It would be useful to include more detailed guidance, including case studies and exemplars, in relation to this.

**Question 6: Does the network planning section of the document clearly define the processes to be undertaken by local authorities to deliver the duties with the Active Travel (Wales) Act?**

The processes are generally set out but we feel there is room to expand on these and provide, for example, more detail on the level and type of consultation activity that Welsh Government would consider to be sufficient at each stage of the process.

**Question 7: Is the process for designing active travel routes on links understandable?**

Generally yes, but this is not an area of expertise for NRW.

**Question 8: Is the process for designing active travel routes at junctions understandable?**

This is not an area of expertise for NRW.

**Question 9: Is there any notable conflict in the Standard Details in the design guidance with current local authority design standards?**

This is not an area of expertise for NRW but please note response to Q16.

**Question 10: Do you have any concerns over the applicability of any of the Suggested or Possible Details?**

This is not an area of expertise for NRW but please note response to Q16.

**Question 11: What is your view of the decision not to provide a conventional roundabout standard detail for active travel routes within this document?**

This is not an area of expertise for NRW.

**Question 12: What is your view of the documents approach to the provision of active travel routes on high speed roads?**

This is not an area of expertise for NRW.

**Question 13: Do you feel that inclusion of the Design Element details is helpful?**

This is not an area of expertise for NRW but please note response to Q16.

**Question 14: Do three categories of Design Element (Standard Details, Suggested Details and Possible Details) strike the right balance, giving guidance on established practice while allowing for innovation?**

This is not an area of expertise for NRW but please note response to Q16.

**Question 15: Does the Cycling Route Audit Tool provide a workable means of defining an acceptable standard for cycling routes?**

This is not an area of expertise for NRW but please note response to Q16.

**Question 16: We have asked a number of general and specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

We note that whilst 'Attractiveness' is cited as a factor to be taken into account in the design guidance it is not consistently apparent throughout the design and delivery guidance and the Action Plan. Also the guidance reflects a poor and inconsistent understanding of 'attractiveness' – for example on p.62 and p. 75, attractiveness is equated with lack of lighting and poor visibility which are perhaps more obvious safety issues. There is a mismatch between the interpretation of attractiveness in these tables on pps 62 and 75 and the objectives for attractiveness listed on p.95. Greenspace and its attendant wildlife interest, as well as proximity to interesting heritage features can enhance people's sensory and intellectual appreciation and enjoyment of the outdoor environments through which they are travelling but this is poorly reflected in the guidance. Visual images provided within the guidance (e.g. P.31, photo 6.,1 p. 89) disappointingly use only examples of hard landscaping to encourage thinking about design for active travel. There is no reference in the guidance to assessing impacts on the natural environment nor on designing in such a way as to maximise benefit for the environment (e.g. integrating with SUDS, incorporating planting schemes) and respond to a sense of place (e.g. through careful choice of colour for surfacing materials in order to blend with local building stone). It appears that the only reference in the document to 'blending in with local environments' is one that relates to careful use of signing and road markings (p. 122).

Better guidance, including case studies, is required to help local authorities; (a) assess the impacts of any active travel proposals on the natural environment and (b) design active travel schemes that make space for nature, geology and historic/cultural heritage.

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## **B. Consultation - Delivery Guidance**

### **General Questions**

**Question 1: Does the draft delivery guidance provide the information local authorities will need to meet their duties under the Act? If not, what else needs to be covered?**

#### ***i. Definitions***

Further clarification of some definitions would be welcome. For example, facilities appear to 'include cycle shelters/ parking/ storage and public toilets'. Does the term exclude other facilities or could other facilities such as benches, lighting, dog fouling bins etc. (indeed anything that increases the attractiveness and facilitates or encourages active travel) be covered by this term?

#### ***ii. Understanding implications***

NRW believes additional guidance and good practice examples may be required to ensure all relevant departments of local authorities (not only the highways departments), understand the implications of the Active Travel duties, and how they need to be taken into account and delivered positively, in the spirit of the legislation, in their planning and decision making processes.

Additionally, guidance notes for other organisations and individuals/businesses that may be impacted by these duties might be useful (e.g. advice notes on the implications for landowners/ social landlords, developers, users of the routes, schools etc).

### ***iii. Monitoring/Data development***

The duties potentially place an onerous responsibility on Local Authorities to gather data on how the level of use of active travel routes and related facilities change over time. The guidance advises that different monitoring mechanisms may be suitable: this is a challenging area of work and we believe that Welsh Government needs to provide leadership and overall coordination of monitoring activity in order to ensure that a cohesive, affordable and sufficiently robust approach is adopted by Local Authorities throughout Wales. This approach needs to result in meaningful data that is relatively easy to gather, and should enable the effective evaluation and review of success that Welsh Government aspires to achieve (para 2.8.2).

The guidance is insufficiently clear on the type of data to be gathered and the relevant indicators that should be used (in relation to quality, quantity, impact on individuals and communities – from routes, facilities, information provision etc). Information on monitoring and data gathering is currently scattered throughout the two sets of guidance (and mentioned in the Action Plan). It would benefit from being pulled together in a clear format, as part of the comprehensive, Welsh Government-led approach to monitoring and evaluation outlined in the above paragraph.

The Action Plan, in its current form, doesn't provide sufficiently detailed information on monitoring requirements (as is suggested in para 2.8.3). We believe there is a need for a single overall monitoring and evaluation programme, led by Welsh Government and shared by Local Authorities and other key partners.

### ***iv. Consultation requirements***

As in the case of data development and monitoring requirements, guidance on consultation appears to be scattered throughout the document, and is also shared and duplicated, to some extent, between the design and delivery guidance. It may be useful to produce a supplementary advice note to guide local authorities through consultation requirements at different stages in the process of developing and delivering the Active Travel plans, in order to provide clarity and to enable Local authorities to feel more confident that they are undertaking sufficient consultation at each stage.

### ***v. Developing the plans***

Guidance on data to be collected could be made clearer. For example, the requirement for the existing routes map includes 'routes and facilities in the current settlement' – does this include routes through urban greenspaces, through business and retail parks and housing estates, along canal towpaths through urban nature reserves etc? Is there a risk that

highway departments may not identify the full range of existing routes unless they're more explicitly described in the guidance?

Similarly, for the integrated network maps, we would encourage authorities to develop creative approaches, looking at a range of potential provision, including for example routes on NRW managed land, land managed by 3<sup>rd</sup> sector organisations, sites owned and/or managed by private business and public utilities and sites earmarked for future developments.

It may be useful to provide a practical guidance tool (possibly as an annex to the main guidance document) to guide local authorities through the process of developing integrated network plans – covering the full range of associated activity such as consultation (internal and external), marketing, communications, design etc – that would then facilitate the production of implementation plans. In identifying potential stakeholders (internal and external) it will be important to involve not only with service users but organisations and businesses that help supplement the service provision. The guidance mentions individual landowners but there are other organisations and bodies – such as NRW, some 3<sup>rd</sup> sector organisations and private businesses and utility companies that could contribute to the development and delivery of the active travel agenda. Other plans that should be used to inform active travel proposals will include greenspace audits, natural resource management plans, infrastructure plans and plans for new school build programmes.

We would encourage authorities to integrate their active travel plans with recreational plans both within and also beyond designated areas, and also to share and adopt best practice in non-designated areas. We have suggested below, in our response to the consultation on the Action Plan, that it would be useful to develop a few early exemplars of integrated active travel and recreation plans to encourage the adoption of this approach across Wales.

#### ***vi. Implementing the active travel plans***

It may be useful to provide a template for implementation plans to illustrate the nature and level of detail of information to be included, not only on the physical improvements to identified routes but also for other related activity such as improvements to related facilities, marketing, communication, consultation, monitoring etc. Including timescales for delivery of these activities, and making the implementation plans available to the public would be valuable in providing people and communities with information about when they can expect improvements to be achieved.

#### **Question 2: Are the approaches in the guidance the most appropriate way of delivering the requirements of the Act? If not, what approaches would be more appropriate and why?**

The approaches outlined appear appropriate but it will be important, through learning and regular review, for Welsh Government and its partners to modify and identify new approaches in order to deliver the intended outcomes as effectively as possible. Other potential mechanisms, for example, that have not been identified to date, include

incorporating conditions related to active travel within publicly funded developments (e.g. private tourism investments supported by Visit Wales funding, NRW grant aided programmes, community and regeneration investment programmes), and ensuring that purchase of land by local authority departments other than the highways department also makes provision for active travel (e.g. Welsh Government's current new 21<sup>st</sup> century school build programme does not allow Local Authorities to purchase any land beyond the immediate footprint of the school *pers.comm*)

**Question 3: Would the actions in the delivery guidance incur costs on you, your organisation and/ or the people your organisation represents?**

Costs may be incurred by NRW in upgrading and maintaining routes and facilities on land it manages, if identified as part of existing or integrated network plans.

The guidance is likely to require NRW to be more proactive in seeking opportunities for appropriate Active Travel provision through its advisory role, e.g. in relation to planning applications and road scheme consultations, which may require increased resources and/or skill development within the organisation.

**Question 4: Are the links between the delivery guidance and the design guidance sufficiently clear?**

We feel there is room to review and strengthen the current documents in order to minimise the elements of repetition, duplication and fragmentation that are currently apparent, and to provide more detail on some issues, as outlined in replies to other consultation questions. We feel that there is scope to combine the documents into a single design and guidance manual which can be supplemented with detailed advice notes, templates, case studies etc, as required - as this may be more practical and less cumbersome than having two separate documents. The Action Plan could continue to stand alone as a separate, but related document and be expanded to include local implementation plans, the overall monitoring and evaluation plan, best practice/case studies/exemplars arising from identified actions.

**Question 5: We have asked a number of questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

No further comment on this question.

These are questions about specific elements of the guidance.

**Question 1: Do the features and facilities listed for inclusion in the maps capture all those that would be necessary for people to decide where to travel? Do any not need to be included?**

Other features to include (in addition to parks) are accessible nature reserves and forests.

The guidance allows for discretion in terms of what to include. The guidance isn't clear however about the process that should be adopted in order to arrive at a decision about what to include. Should this activity form part of the public consultation, so that people and communities can determine themselves what is important to them in their local areas? The need for more detailed guidance on such aspects is referred to in response to Q1 above.

**Question 2: What are your views on the consultation processes for the existing routes maps and the integrated network maps?**

See previous responses.

**Question 3: What are your views on the guidance on how local authorities should deliver their duties to make year on year improvements to active travel routes and facilities?**

Delivering year on year improvements will be challenging, particularly in the current climate and without additional funding to undertake many of the activities referred to in the guidance. Successful delivery appears to rely heavily on encouraging interdepartmental and cross-sectoral dialogue and on building strong relationships and collaborations, which will require dedicated support and commitment at all levels particularly within local authorities and Welsh Government departments. It will be important to acknowledge, understand and respond appropriately to identified barriers to delivery, particularly in the early years of implementing the Act.

**Question 4: What are your views on the circumstances when it would be unreasonable to make enhancements for walkers and cyclists in exercising functions under the Highways Act?**

No comment on this question

**Question 5: What are your views on how local authorities can promote active travel in exercising their functions under the Act?**

This aspect will require staff to work across local authority departments and will also require the support of other public and third sector organisations, as well as a number of Welsh



Government departments. It would be useful for Welsh Government to demonstrate leadership in this area and work with one local authority (and other key partners) to develop an exemplar approach to promoting active travel, which will also provide partners with a better understanding of the challenges involved.

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## C. Consultation - the Active travel Action Plan

**Question 1: Do you agree with the main barriers to walking and cycling identified in the Draft Action Plan?**

Yes

**Please provide more details below:**

Key barriers appear to have been identified in the Draft Action Plan but it would be useful to supplement current research findings with additional evidence in relation to specific programmes and initiatives (such as Walk to School, National Standard Cycle Training) in order to understand barriers facing specific groups or communities targeted by such interventions, so that effective approaches may be developed to deliver the active travel aspirations of Welsh Government.

**Question 2: Do you agree with the actions we have identified to address the barriers to walking and cycling?**

In part

Please provide more details below:

The Action Plan appears to have emerged from a broad trawl of Welsh Government activity that has some relevance to walking, cycling and physical activity. As such it clearly includes some activity that will help deliver Welsh Government's aspirations for Active Travel but overall it conveys a sense of being a rather random and unfocused assemblage of actions, programmes and projects.

NRW advises that some fundamental reworking is required to create a more focused, prioritised Plan with clearly allocated roles and responsibilities. Specific issues that need addressing within the current Plan are as follows:

- ***The need for a stronger and more consistent strategic approach throughout the Action Plan.*** The plan does not currently include a clear articulation of objectives and timescale for each category from which a logical, well-reasoned set of actions can be developed, and then a set of potential partners identified to take them forward.

- ***The need for actions to be clear, consistently framed, relevant, well-reasoned and prioritised.*** Some of the actions have very tenuous links to Active Travel. For example, the CAN programme was focused on providing recreational infrastructure and very few of the sites are likely to fall within scope of Active Travel planning for the designated settlements. The same can be said for the Wales Coast path programme and NRW mountain bike destinations. These are not interventions that were specifically designed to promote active travel and whilst they may help create a walking and cycling culture in Wales they are unlikely to be priority projects for Active Travel infrastructure development. Actions in the plan are currently a mix of actions (e.g. Encourage collaboration.....) and project/ programme titles (e.g. Let's Walk Cymru) or simply headings (Physical Activity guidance and information for health practitioners). Action statements need to be framed as such, and the Plan needs to be more specific in terms of the action required to deliver Active Travel objectives for each category. Take, for example, C5 'further develop NERS'. In what way does it need to be developed specifically for Active travel objectives? What is the evidence currently telling us about the success or otherwise of this programme and how does this understanding translate into a clear action which specific partners can take forward over a given time period? Many of the actions require more narrative to explain more clearly how they're currently delivering for Active Travel objectives, what issues or barriers are affecting delivery, and how these could be overcome.
- ***The need for partners to be identified more intelligently and more specifically.*** The current list of leads and partners is broad and vague and does not engender a strong sense of commitment to prioritising and delivering actions. Adopting a more strategic and well- reasoned approach to identifying and prioritising actions, as described above, would enable delivery partners to be identified more specifically. If actions include several elements that require leadership and engagement from different organisations it is important to identify this in the plan and ensure that roles and responsibilities are clearly assigned to each action and its sub-components.

**Question 3: Are there other actions that you think should be included in the action plan? Please list them and indicate who should be responsible for undertaking them.**

Yes

Please provide more details below:

The area which appears very weak or missing entirely in some respects from the plan relates to the long term provision of accessible greenspace within and round settlements – this includes not only the maintenance and management of existing greenspace close to people's homes and on potential active travel routes but also the provision of new accessible greenspace as part of new development. Given the emerging evidence (from the Wales Outdoor Recreation Survey 2011-2) about trends in recreational behaviour, accessible greenspace close to people's homes contributes significantly to creating a culture of walking and cycling as well as providing opportunity for providing safe, attractive active travel routes within wider networks. We feel that training and guidance should be provided for non-highways staff in Local Authorities (e.g. Planning Departments, Countryside Departments), as well as to relevant advisory staff in other organisations, in order to develop better

understanding of the Active Travel agenda, and to build a strong commitment to creating opportunities for active and recreational travel through securing high quality accessible greenspace within and around designated areas.

NRW would also welcome the inclusion of an action to develop exemplar approaches that integrate Active Travel and recreational planning within and around designated settlements (and across Local Authority boundaries) in order to demonstrate good practice and share learning across Wales, and between public, private and third sectors.

The section on gathering and sharing evidence is also weak in the plan. Having set key objectives within the plan and having identified the priority activities that will most effectively deliver these objectives over given timescales it will be important to ensure that progress is monitored and that the effectiveness of the actions is assessed by Welsh Government and the delivery partners.

We would advise therefore that an additional section is included that will describe more fully how the Plan and the actions within it will be monitored and evaluated, and how other evidence will be gathered to help inform the plan as it is delivered and subsequently reviewed by Welsh Government and others.

We would also advise that the Action Plan should set out, in a separate section, future governance and communication arrangements that will help ensure effective engagement and coordination, strong and inclusive leadership and continual learning and sharing of best practice between all sectors, both within and beyond Wales.

The Design Guidance emphasises the importance of integration and cites evidence from the Cycling Demonstration Towns in England (page 5) that political commitment, skilled delivery teams, engagement, encouragement and promotion are as important as infrastructure provision in delivering a successful active travel programme (Cycling England 2010). The action plan should ensure it has identified actions that will address requirements in all areas that are known to affect the delivery of active travel objectives.

**Question 4: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please tell us below:**

**Please enter here:**

NRW's major concerns over the Action Plan are described in responses to Q2 and Q3 above. We would welcome an opportunity to support Welsh Government in reviewing the current Action Plan along the lines outlined above.

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