

## **Consultation Response Form**

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**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?

Please enter here:

Yes, we welcome the single manual.

**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?

Please enter here:

We welcome this greater emphasis on creating a modal shift to walking and cycling however, we believe that this could be strengthened in the opening paragraphs by including a reference to the importance of how active travel can be a mechanism for helping to reduce emissions to help tackle the climate and nature emergency whilst also benefiting human health.

**Q3:** Do you agree with the intention to show both the Existing Routes Map and Integrated Network Map together as the Active Travel Network Map (ATNM) in future mapping cycles? (1.1.4 and 5.5)

Please enter here:

Yes, we welcome a single Active Travel Network Map.

**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?

Please enter here:

2.2.3: We would like to see an addition to bullet point two – ‘It improves resilience by reducing carbon emissions and other harmful pollutants through reducing vehicle use. Through protecting green infrastructure and including it in active travel design it can aid well-functioning ecosystems and the biodiversity they support whilst providing natural solutions that help build resilience of the environment, people and communities.

2.3: We welcome the addition of the Environment (Wales) Act within the guidance, however you only refer to the Section 6 duty, which we do not believe reflects entirely the of the Act and the consideration that should be paid to it. We would like the authors to consider revising the content of this section to include the following:

- Well-functioning ecosystems and the biodiversity they support, provide natural solutions that help build resilience. This, in turn, helps society create jobs, support livelihoods and human wellbeing, adapt to the adverse impacts of climate change and contribute to sustainable development.
- The Environment (Wales) Act, 2016 aims to build greater resilience into our ecosystems. The Act sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to the statutory principles of the sustainable management of natural resources (SMNR) defined within the Act.
- The Natural Resources Policy under the Act sets the context for Area Statements, which are produced by Natural Resources Wales (NRW), ensuring that the national priorities for SMNR inform the approach to local delivery. Area Statements include information about the natural resources in that place, the benefits they provide and the priorities, risks and opportunities that need to be addressed to achieve their sustainable management. Area Statements will help to coordinate work, to strengthen the resilience of our ecosystems and enhance the benefits they provide us. Local Area Statements can be found on the NRW website.
- Section 6 under Part 1 of the Act introduced an enhanced duty (the S6 duty) for public authorities in the exercise of functions in relation to Wales. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. Local Authorities must have regard to the guidance produced by the Welsh Government to assist and support public authorities to follow the S6 duty.
- For the development of active travel schemes, this means that local authorities should have regard for their Area Statement and should embed the consideration of biodiversity and ecosystems into their early option development, through scheme design, to day to day management activities.

2.5: We would welcome a more ambitious approach to alignment with Planning Policy Wales 10 that will deliver multiple ecosystem benefits, reflecting the principles of Sustainable Management of Natural Resources (PPW10: s3.30, page 32) in active travel schemes. Enhancing ecological networks, noise minimisation, carbon sequestration as well as pollutant removal are benefits derived from enhanced active travel routes. These enhanced active travel routes have the potential to become important mechanisms to address local ecological resilience, bridging the gaps between rural connectivity and urban greenspaces.

Missing:

- We believe that reference should be made to the Public Health (Wales) Act 2017:
  - The imminent duty on public bodies to undertake a Health Impact Assessment in specified circumstances. We are aware that the regulations are still to be produced, however a HIA should be seen as good practice in designing any project or programme and can be used to engage with broader stakeholders in the design phase.
  - Healthy Weight, Healthy Wales. This new obesity strategy for Wales pays heavy reference to active travel in the Strategy and Delivery Plan and we believe it is essential to reference it here.
- We also believe that reference should be made to The Clean Air Plan for Wales: Healthy Air, Healthy Wales.

**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?

Please enter here:

No comment

**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)

Please enter here:

No comment

**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?

Please enter here:

No comment

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

Please enter here:

1. The development of this revised guidance is welcome, and we are pleased to be recognised as a valued partner throughout the document. We note that the enhancements to encourage active travel will also bring additional opportunities for people to access the outdoors for other forms of outdoor physical activity. We also note that Active Travel provides the opportunity for increasing an awareness of the impact and opportunities for natural resources and the benefits to be gained from them.
2. We welcome the strong emphasis on inclusivity and equality and that the guidance includes users of mobility scooters in its definition of walkers (4.3.1). Could we suggest that it may be worth reiterating this point in para 9.7 to ensure that any bollards do not obstruct any legitimate users of rights of way including those in mobility vehicles. NRW has led the development of guidance on improving access for all in Wales and is currently looking at improved and innovative mechanisms for promotion which may be useful to Active Travel colleagues. Further information on our website  
<https://naturalresources.wales/days-out/recreation-and-access-policy-advice-and-guidance/managing-access/improving-access-for-all/?lang=en>
3. We strongly welcome the many references to the need for integration with other plans, including Rights of Way Improvement Plans, for which NRW is a statutory consultee. Local Authorities' assessments, assessing public needs and current provision will be of direct relevance to ATNM and can support wider active travel policies across the authority area, outside of the areas designated for Active Travel. We note the WG intention to review further integration with ROWIP under the Access Reform Programme in [Expert Group 3](#).
4. The following points are in reference to horse-riders (4.3.5, 14.36.7, Diagram on pg439, 13.1.4 and Glossary). Please note that some points below are in relation to Part 2 – Design and the Glossary, but as the points are all linked, I have left them together:
  - There is a need to consider the impact of Active Travel developments on existing recreational users, particularly horse-riders. We suggest that point 14.36.7 be further strengthened to mitigate against loss of routes for horse-riding, in line with paragraph 4.3.5 earlier in the guidance. We welcome the point that public right of way for horse-riding should not be removed through changing the status of the right of way. However, authorities will need to be mindful that changing the surface of the route could have the same effect as to make the route unsuitable for horse-riders to the extent that they no longer use it.
  - With only approximately 20% of the rights of way network across Wales available to horse-riders (and lower proportions locally) the network of routes is fragmented and as with active travellers, recreational users share safety concerns in using the road network as an alternative to safer off-road routes. We suggest Active Travel Planners refer to any policies in relation to horse-riding provision in the ROWIP and consultation with the local authority PROW staff and Local Access Forum.

- Further suggestion that the definition in the Glossary: Bridleway – A right of way for people on horseback, cycles or foot only be amended to highlight that the right to cycle on a bridleway is given provided they give way to walkers and horse riders (s30 Countryside Act 1988) Also the diagrams on page 439 suggest the diagram includes reference to Bridleways and Byways Open to All Traffic to make this point clear. Paragraph 13.1.4 suggest the category shown should distinguish traffic free bridleways and not just traffic free shared use.
5. In relation to promoting the active travel routes and encouraging promotion of responsible use:
- There are several sources of information and good practice that would support local authority's duty to promote active travel and encourage use. These are beneficial to encourage both active travel and outdoor recreation and that users behave responsibly and with respect for others. Some examples include:
    - the following trail guide:  
<https://cdn.naturalresources.wales/media/681452/the-trail-users-code.pdf?mode=pad&rnd=13199984897000000>
    - And the Countryside Code, <https://naturalresources.wales/days-out/the-country-side-codes/?lang=en>
  - This is another area that will be considered as part of Access Reform Programme which we are working on with WG <https://gov.wales/access-reform-programme> and in which there would be benefits in having integrated and shared messages
6. We strongly welcome the identification of Local Access Forums as stakeholders that should be consulted in the development of ATNM.

**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?

Please enter here:

No comment

**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?

Please enter here:

There are a number of points made in Q14 below that are relevant to this question, in particular, point 3.

**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?

Please enter here:

Please see our response in Q14.

**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?

Please enter here:

We believe that it would also be good to include the use of Health Impact Assessment (regulations due under the Public Health (Wales) Act 2017) as a method of engagement with users to inform scheme design and discuss recommendations, mitigations and enhancements across any actual and perceived impacts. We believe that this would work well with EqIA and would add value to communities and the ATNM routes themselves.

**Q13:** Chapter 20 on Monitoring has been expanded to give more specific guidance and includes a template.

Does this provide sufficient clarity?

Please enter here:

No comment

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

Please enter here:

1. We are pleased to see that many of the issues that we raised in the previous consultations have been addressed, in particular we welcome the more detailed guidance in section 16.5 on the use of vegetation to increase the attractiveness of active travel routes. To further strengthen this section, we request that table 4-2, p119 contains a recommendation to increase the attractiveness of cycle routes by the use of appropriate vegetation, ideally accompanied by a cross-reference to section 16.5 to enable readers to easily find further details. We also request a cross reference to this section from the statement on the use of trees and hedges as windbreaks in table 3-2 p87 "Factors affecting cycling effort".
2. The current guidance contains many helpful references to trees as part of active travel routes. However, it is still possible for anyone designing active travel routes to get the impression that the costs of planting and maintaining trees outweigh their benefits. We would like to request an insertion of words to the effect: "the ecosystem services provided by large species of trees start to outweigh their initial planting and annual maintenance costs at around 60 years

of age and can then be supplied for 200 or more years before the tree requires replacement". We would like to see reference in the guidance that active travel planners should therefore avoid the false economy of planting short-lived tree species. (See Street Tree Cost Benefit Analysis. Green Blue Urban Ltd. Bodiam, East Sussex. 2018)

3. We note with some concern that this guidance says very little about the design of active travel routes to minimise user's exposure to particulate air pollution. Currently, this mostly comes from diesel powered vehicles, but this particulate air pollution also comes from brake dust, tyre rubber and road surfacing materials. There is no safe level of exposure to this fine dust (aka PM2.5) and active travel users will continue to inhale it whenever they are within a few metres of the vehicle carriageway. However, there is substantial evidence of the benefits of low hedges (either planted in the ground, or in planters) to block and trap airborne dust. We request the inclusion in this guidance, that regard be placed to the placement of hedges to separate active travel route users from dust generated by the vehicle carriageway. (See K.V. Abhijith, Prashant Kumar, John Gallagher, Aonghus McNabola, Richard Baldauf, Francesco Pilla, Brian Broderick, Silvana Di Sabatino, Beatrice Pulvirenti. Air pollution abatement performances of green infrastructure in open road and built-up street canyon environments A review. Atmospheric Environment 162 (2017) 71-86).
4. We also note with some concern the absence of any reference to designing active travel routes to be resilient to the effects of climate change (see Kazmierczak, A., Brookfield, C., Cavan, G. and Lindley, S. 2016. Climate Change Vulnerability Mapping in Wales. The Welsh Government, Cardiff. 2016). Given the climate and nature emergency we are facing, we request that the final document includes stronger recommendations on the use of trees, hedges and other vegetation to provide shade, evaporative cooling, improve drainage (see SuDS below) and provide shelter from high winds for active travel routes (see S.E. Gill, J.F. Handley, A.R. Ennos, S. Pauleit. Adapting Cities for Climate Change: The Role of the Green Infrastructure. Built Environment Vol 33 No 1 (pp. 115-133) 2007).
5. We welcome the reference to Sustainable Drainage Systems (SuDS) in Section 2.8 on page 24, but request that the final document includes guidance on the use of SuDS to deliver multiple benefits as part of the green infrastructure accompanying active travel routes. This should include cross references to 16.5.7 on page 233 which describes the integration of trees with SuDS without actually mentioning SuDS. (see Morgan. C et al, Water Sensitive Urban Design in the UK – Ideas for built environment practitioners. CIRIA. London. 2013)

**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 favorably than English.

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

No comment

**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 favorably 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 favorably than the English language.

No comment

**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:

Please enter here:

No comment

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: