

Living Street's response to the Welsh Government consultation on the Design Guidance for the Active Travel (Wales) Act 2013

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

As a member of the drafting consortium, Living Streets supports the approach to active travel routes and facilities taken in the guidance.

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

Everybody is a pedestrian at some point in their day. As the national charity for pedestrians, we represent everybody whether they identify themselves as a pedestrian or not. Walking, and by extension walking infrastructure, is often taken for granted because it is a commonplace activity. Nevertheless, barriers to walking can have a disproportionate impact on some people, for example, people on low incomes without a car, older and disabled people, including those with vision, hearing, mobility and cognitive impairments. Conversely, improving the quality of the public realm and its 'walkability' delivers tangible economic, environmental, health and social, benefits for everyone. The design guidance establishes a blueprint for active travel in Wales and sets the bar for the rest of the UK.

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

No, the guidance is very comprehensive.

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?

Yes. For the trunk road network mandatory clauses within the DMRB take precedence. If a highway designer identifies conflict between the DMRB and the design guidance then this can be addressed through the Welsh Government's 'departure from standards' process.

Local authorities are encouraged to innovate, but should retain all documentation relating to their design decision which then forms the basis of the 'explanation' required by the Active Travel Act.

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

Yes it does, however, chapter 4 would benefit from a more uniform structure. The introduction lists the needs of people walking and cycling for coherent, direct, safe, comfortable and attractive routes. The walking section uses these headings to go into more detail, whereas the cycling section ignores them altogether – but has a helpful summary under the same headings and a useful table in chapter 5 (table 5.3). Although the needs of walking and cycling are different, the organising principles are the same and should be emphasised to make it easier for highway designers to gain an overview and comparison between the two modes.

'The effort required to cycle' should be addressed as part of the introduction. The detail can then be interspersed as appropriate under the 'needs' headings. For instance, 'Cycle comfort' should explain how the effort required to cycle (stopping, starting and maintaining a regular speed) can be mediated through the provision of smoother surfaces and avoiding steep gradients. Safety should address the cycle/car relationship, traffic speeds and the basic physical dimensions required for anything from a tricycle to a cargo bike. Directness could be addressed through cycle speeds and journey distance and time, and so on.

In the case of both walking and cycling accessibility/inclusivity should perhaps be addressed as an additional need to reflect the importance of the Equality Act 2010 – it is introduced in the audit of walking routes (page 61). This should not replace the need to audit the coherence of walking networks.

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 network planning sections set out the processes local authorities need to follow in order to produce integrated network plans for walking and cycling. However, there is a need for better structure and clarity. The design guidance is full of helpful information, but sometimes less is more. For instance, it is sufficient to say that network plans need to be integrated with transport, land use and other plans, and to list examples in an appendix at the back (presented with long lists, the highway designer may put this manual back on the shelf!).

Living Streets will be submitting more detailed editorial comments on the design guidance to the editorial team, in addition to this consultation response.

Response to:

- **Question 7: Is the process for designing active travel routes on links understandable? And**
- **Question 8: Is the process for designing active travel routes at junctions understandable?**

As stated above the design guidance is full of useful information, but the current structure makes it difficult for a lay reader to follow the design process. This could be improved, for example, through numbering sections and sub-sections to show where one topic is subordinate to another. Short bullet point summaries (e.g. as in the introduction to sections 6.3 and 6.10) together with section numbers, would provide a helpful overview of each part of the design process and quickly direct the reader to the relevant section.

A more challenging issue is *how* to organise the information given. It would perhaps be useful to introduce some sort of matrix or checklist to provide an overview of issues to consider, for example:

	Links	Junctions	Crossings	Bus stops/transport interchange
Primary roads	Speed (vehicular and cycle) Trip generators Available space Traffic calming	Space available Traffic volume Trip generators Pedestrian and cycle numbers	Desire lines Waiting times Crossings times	Pedestrian and cycle volume/conflict Space available
Secondary roads				
Local roads				

The link between design guidance and specific Design Elements is very helpful.

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

No comment.

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

No. Innovation will always involve a degree of risk (real or perceived) through the absence of local evidence. Where there are concerns, designs have been identified as Possible Details with the proviso that they will be dependent on the local situation, may be considered for use in pilot schemes and will require careful monitoring to see how they work in practice.

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

No comment.

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

The guidance would benefit from addressing the needs of communities living alongside busy roads, in particular the impact of community severance as opposed to the severance of pedestrian routes. This is relevant, for example, to pedestrian provision where roads are being widened (near homes) and to new housing developments next to busy roads on the outskirts of towns and villages.

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

Yes, because illustrating the range of design options available will help to ensure clarity and understanding to ensure the best choices are made for each locality.

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?

The categorisation of the Design Elements enables local authorities to differentiate between design options, by identifying established best practice and indicating the degree of confidence to with which new cycling (and walking) infrastructure may be adopted. For instance, there are five bus stop options incorporating cycle infrastructure. These are all innovative, but option 5 (the shared use option) offers more potential for conflict between cyclists and pedestrians and so is identified as a 'possible detail' not a 'suggested detail'. Where such details are adopted, the guidance is sensible to advise careful monitoring (e.g. through pilot studies) to gain more experience in Wales.

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

No comment.

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:

No comment.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: