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Consultation on Active Travel Act Design Guidance

Dear Sir/Madam,

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.

We welcome the opportunity to comment on the Design Guidance to accompany the Active Travel Act. As Sustrans was represented on the panel that wrote the design guidance, our response takes the form of a letter rather than answering the consultation questions.

Best practice infrastructure

One of the key aims of the Active Travel Act is to ensure that new infrastructure for active travel is up to the highest standard. This is particularly true of cycling infrastructure, much of which built in Wales has been sub-standard, often giving the impression of being introduced as an afterthought. Local Authorities have been accused of putting in cycling infrastructure that is easy to install, but not that will enable a safe, comfortable and direct journey. Fear of traffic is the main reason given when people are asked why they do not cycle, and poor quality infrastructure is a key part of the reason why more people in Wales have not been persuaded to cycle.

Therefore, we welcome Chapter 6 and Appendix A of the document, which provides clear best practice examples to engineers about how to design for walkers and cyclists. It is crucial that these design examples are upheld and that a widespread training programme is introduced to help develop transport engineers' confidence in using the guidance.

We welcome the rating system, which highlights to engineers exactly what is already common in Wales and the UK, what options have worked abroad but have few UK examples

or are considered to be radical approaches. Each location is slightly different, but the weighting system will help engineers understand what may be suitable for their area and encourage them to try innovative solutions. However, it's important that engineers understand the context of the design details, and therefore we'd welcome moves to strengthen this – potentially via an Executive Summary to the Appendix, or to have some of the design details included in the main sections of the document, so the context and design detail run more parallel throughout.

The guidance contains a clear process for determining appropriate levels of infrastructure relative to traffic flow and speed data. This includes up to date thinking on road space reallocation, such as centreline removal to facilitate 1.8m cycle lanes and infrastructure which better reflects the way in which cyclists are trained to interact with other road users rather than traditional approaches which can often marginalise them. For example, peripheral cycle lanes on roundabouts are rejected in favour of a tightened circumference and reduced entry and exit flares leading to lower vehicle speeds allowing cyclists to utilise the existing traffic lanes. Wider concepts, such as filtered permeability, allow opportunities for better modal-balance and network coherence in dense urban areas.

In addressing the needs of pedestrians in greater detail than other guidance, options for development of shared use paths and shared space are considered in the context of place-making as well as movement. This should lead to a better balance of infrastructure for users and reduce some existing approaches such as unsegregated footways converted for shared use without appropriate design considerations. Alongside assessing their appropriateness before installation, it's vital that any new shared spaces are monitored as to their effectiveness, and in many cases in urban areas with high flows it will be important to segregate cyclists and pedestrians.

Network Planning

We welcome Chapter 5 of the design guidance and the comprehensive network planning tool that is provided for use by local authorities, which is considerably simpler and user-friendly compared to previous guidance on cycling and walking audits. Comprehensive network planning will ensure that the Integrated Network Maps set out a clear vision in each area to be mapped. Its use by local authorities will ensure that future funding for walking and cycling routes is spent better, and leads to the creation of routes that form a usable network.

A crucial part of making walking and cycling the preferred mode for everyday local travel is making the network of routes comprehensive, giving people a safe journey from where they live, to work, to school, the shops or to other communities to visit friends. Our current networks are patchy at best, often with 'stop-start' infrastructure that can disappear. This is further frustrated by the inclusion of signs which are meaningless to the user "e.g. end of route" and "cyclist dismount", which are often more about the council seemingly discharging their liability. A clarification of the Departures from Standard process for Local Authorities in Wales relative to non-standard signage would also help in this regard, especially following guidance changes from the Department for Transport (DfT)

Many people are put off using the bike for their everyday journeys because of the absence of continuous and safe routes, particularly where junctions and right turns are part of the route but there is no infrastructure to cater for these manoeuvres.

For both pedestrians and cyclists, the approach of modelling user needs as a basis for network planning, using a range of data where available, is key to developing a holistic and integrated network which is fit for purpose and fulfils the aspirations of the Active Travel Act in increasing journeys by foot and cycle.

Consultation

Good public engagement is key to maximising local support and use of new walking and cycling networks. Sustrans own work draws heavily on this; our recent lottery-funded project made up of 80 schemes across the UK saw each scheme have its own steering group, with members of the local community part of the process.

Our innovative community and street design work has engagement with the local community at its heart, inviting their ideas from the earliest possible stage – learning about the issues in their community and what would be important for them in the future. Community involvement has led to better projects and, importantly, public support for what is often quite radical change.

Traditionally, consultations in Wales have followed the statutory guidelines, with any plans being produced in advance of discussions with the community, and a 12 week consultation period.

We therefore particularly welcome section 3.2 of the Design Guidance, which highlights best practice consultation with community engagement taking place before the draft Integrated Network Map has been produced. Involving local communities in planning their network should lead to greater public support, and highlight potential issues at the earliest possible stage.

Speed limits

We welcome the guidance on the appropriate infrastructure for certain routes, based on their speed limit, as contained in table 6.2 – however, we do have a concern that while this guidance might work in urban areas, there is an issue with rural (or potentially suburban areas, too) lanes that link settlements.

In Wales there are many rural lanes where the national speed limit is in place, but in practice average speeds are much lower and the traffic flows are suitable for their use as active travel routes (under previous guidance). Many sections of the National Cycle Network use these types of roads. While the speed limit could be lowered along sections identified as active travel routes, this would lead to significant sign clutter, be difficult to enforce and it is unlikely local authorities would be willing to take forward such an approach.

Therefore, we suggest that further work is undertaken by the Design Guidance expert panel, perhaps adding a note to the table, to assess whether using the 85th percentile on some rural roads would be more appropriate than a changing speed limit in these circumstances.

We welcome the Design Guidance. Sustrans believes this to be a strong document which, properly implemented, will maximise the potential outcomes of the Active Travel Act and mainstream walking and cycling as the means of transport of choice for short journeys. However, guidance alone cannot create a culture change within the transport sector and a programme of accompanying training and good practice sharing is essential. It is also vital that funding structures are reviewed to take cognisance of the approaches recommended in the Guidance.

Yours sincerely,



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