

Consultation Response Form

Your name: Roger Geffen

Organisation: (if applicable): Cycling UK

E-mail / telephone number: roger.geffen@cyclinguk.org / 01483 238322

Your address: Cycling UK national office, Parklands, Railton Road, Guildford, Surrey, GU2 9JX

1. INTRODUCTION

Cycling UK was founded in 1878 and has 72,000 members and supporters. Our central mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits, both for individuals and society.

We welcome the opportunity to respond to the draft revision of the Active Travel Guidance. Overall, Cycling UK is strongly supportive of the guidance, as we were with the previous iteration. We do however believe there are a number of respects in which the guidance could be strengthened.

This response starts with a summary of key points. It then goes on to provide brief answers to the consultation questions. The final, and longest, section of our response then provides a line-by-line commentary on the guidance itself.

2. SUMMARY OF KEY POINTS

Need for a clear and concise summary

1. The guidance needs to be subdivided into:
 - A clear and concise 'executive summary' for decision-makers (e.g. councillors and senior local authority officers) – this should be Part 1; and
 - More comprehensive and technical guidance for practitioners – this should be Part 2.

The current draft does not set out a clear distinction between the purposes and intended audiences of Parts 1 and 2, hence there is still unnecessary duplication between them.

2. The Part 1 'executive summary' should include a concise overview of the key principles of cycle infrastructure planning. This overview should set out the three main forms of cycling infrastructure for the 'links' in a cycle network (i.e. the sections between the junctions:

- *Protected space alongside faster or busier main roads.* The faster and busier the traffic, the greater the need for separation and the greater the degree of separation that is required. Unprotected cycle lanes should be progressively removed and replaced with better forms of infrastructure – as should Advance Stop Lines (but see also paragraph □ below).
 - *Streets or lanes with low traffic volumes and speeds.* We welcome the Welsh Government's interest in making 20mph the 'default' speed limit for built-up streets (with exceptions permissible for more major roads, providing they have segregated cycle tracks alongside them or an equally convenient cycle route on a nearby parallel route). We also call for a similar lowering of 'default' speed limits on non-built-up single-carriageways, and for greater emphasis on filtering out through traffic from town centres and from 'rat-runs' in both urban and rural areas.
 - *Cycle tracks or other routes away from roads.* These can often be the safest and most attractive links in a cycle network. However they must be well linked into that network, so that the network as a whole meets all local journey needs – i.e. they should never be seen as a substitute for creating a comprehensive cycle-friendly road network.
3. We also suggest including a useful 'rule of thumb', namely that the dimensions of cycle facilities should generally be the same as for motor-vehicles but with the widths halved. Other dimensions (e.g. turning circles, visibility splays) should be the same as for motor vehicles travelling at the same speeds.

The wider aim of the Active Travel Guidance: road traffic reduction

4. We seek the inclusion of a clear statement that 'active travel' supports the wider aim of halting and reversing the growth of motor traffic. Defining active travel in these terms would greatly strengthen the guidance's existing statements about the contribution that active travel makes to Wales's 7 well-being goals, while also clarifying the reciprocal relationship between active travel and the reallocation of road space. Reallocating road space can clearly support active travel, but increased active travel also relieves the traffic pressures that enable road space to be reallocated in the first place. This helps create healthier and more attractive streets and communities, while also providing benefits for the economy, road safety (particularly for non-motorised road users), public health (through increased physical activity), air quality and the climate.
5. Given this reciprocal relationship, the guidance should also cite the complementary role of wider road traffic reduction measures, such as road user charging (which can be either congestion and/or pollution-based) or parking levies. These measures can not only influence travel choices, but can also provide a hypothecated funding stream to implement measures to support clean and healthy transport options.

Network planning

6. The guidance needs to provide greater clarity on the process of planning active travel networks, and particularly the stages of:
- Defining the area that a local network should cover, plus any links needed with adjoining areas (i.e. to surrounding villages or other near nearby towns);
 - Identifying the key locations that need to be linked by a comprehensive network;

- Identifying and prioritising the links that are needed, and the preferred alignments for key cycling and walking links (including any existing ‘missing links’). The guidance should give greater emphasis to the role that the Propensity to Cycle Tool (pct.bike) can play at this stage of the process;
- Drawing up and prioritising specific schemes;
- Integrating the network plan with other programmes and plans;
- Securing funding;
- Delivering schemes to high design standards.

Clear wording on requirements and standards

7. Some of the language needs to be more prescriptive, and some of the terms used need to be clearly defined near the start of the document, notably in relation to design standards. There also needs to be clarity over which are meant to be ‘standards’ for the purposes of section 3(6)(b) of the Active Travel Act. Given that the Act makes allowance for Active Travel Network Maps (ATNMs) to record “short sections or minor deficiencies that do not meet the design criteria” (paragraph 5.5.1), we believe the ‘standards’ under the Act should be the ‘desirable minimum’ standards. This would ensure that the desirable standards are not routinely undermined, and are instead treated as standards that should only be breached in exceptional circumstances, with the reasons for these departures always being recorded. Otherwise, the guidance would in effect be sanctioning the inclusion on ATNMs of facilities that amount to safety-critical failures, rather than merely sub-optimal features. It should also be clear that ‘absolute’ maximum and minimum standards are those that should not be breached in any circumstances, as this is the threshold beyond which sub-optimal becomes downright dangerous.
8. There is a similar need to clarify the meanings of words such as “must”, “should”, “could” and “may” – together with their corresponding negatives (“must not” etc) – and to apply them consistently. We suggest that “must” could indicate regulatory requirements and standards that must not be breached in any circumstances. “Should” could be used for guidance that should be adhered to unless there are specific reasons why they cannot be met (or where it is impractical to meet them in the short term). “Could” and “may” can be used to indicate a greater degree of discretion, depending on the circumstances (e.g. the priority that should be attached to a given route).

Integration with other plans and programmes

9. The current draft notes that the Active Travel Act creates a duty for highway authorities to seek improvements for active travel in the context of highway maintenance (as well as highway construction and improvement works). Moreover, 17.6 rightly advises that certain improvements can be introduced at very low cost if implemented as part of a planned maintenance scheme. However the guidance should go further and recommend local authorities to proactively align their active travel and planned highway maintenance programmes, seeking opportunities to deliver active travel improvement schemes when carrying out planned highway maintenance works. It should also highlight that light segregation schemes can often be delivered very cost-effectively at the same time when full carriageway resurfacing is being carried out.

10. The guidance fails to discuss the relationship between Active Travel Network Maps (ATNMs) and Rights of Way Improvement Plans (RoWIPs) – indeed, the duty on local authorities to develop and periodically update a RoWIP is not even mentioned in Chapter 2 (the ‘legislative context’ chapter). Cycling UK wholeheartedly agrees with the distinction made in Chapter 4 between “active travel” and recreational walking and cycling. However, one cannot make such a clear-cut distinction between the purposes of the (predominantly urban) active travel and the (predominantly rural) rights of way networks. Indeed their purposes are particularly blurred in ‘urban fringe’ areas, where off-road walking and cycling routes can serve both to enable ‘utility’ journeys from outlying settlements into a town (e.g. pupils travelling to their nearest school), and to enable families living in a town to go out for walk or cycle rides in the surrounding countryside at the weekend. Where the Rights of Way network serves this kind of dual purpose, it is particularly important that it is surfaced, lit and maintained to standards suitable for making utility journeys in all weathers at all times of year. The guidance needs to explicitly recognise this blending of ‘active travel’ and rights of way networks, with funding arrangements being put in place to facilitate this blending.

Design criteria

11. We also have a number of specific concerns about the design guidance itself. These relate to:

- The ‘dynamic envelope’ for cycling (i.e. the amount of width needed to create safe and comfortable cycling conditions);
- The guidance’s rejection of coloured surfacing – we do not agree with this;
- Its overly-simplistic stance on when it is and is not acceptable and appropriate for pedestrians and cycle users to be able to share space. Whilst supporting the view that separation of the two groups is generally preferable (and that shared use footways alongside built-up streets should be strongly avoided in almost all circumstances), there are some situations where attempting to achieve separation can in fact be counter-productive;
- Clarity on whether ‘hybrid cycle tracks’ are to be regarded in law as ‘cycle tracks’ or as ‘cycle lanes’;
- The design of bus stop bypasses and their approaches;
- Clarity over cyclists’ rights to use bus lanes, including contraflow bus lanes (though it should also clarify that the provision of segregated or light-segregated cycle facilities alongside any heavily-used bus lanes, and the general need to avoid narrow bus lanes);
- The advice on median strips – these are never a good idea;
- The advice on bridges and tunnels. Although we would agree over the need to avoid tunnels which are narrow, poorly-lit and/or with blind corners, a tunnel which is wide, well-lit and with good sightlines can often be preferable to a bridge, given that there is less of a need for a height difference when a cycle / pedestrian facility passes below a road than above it.

These points are addressed in more detail in our full response.

Professional training

12. Although not a matter for the document itself, we note the importance of ensuring that a document of this size is clearly communicated to councillors and senior decision-makers, alongside a professional training programme to impart the requisite knowledge and skills to the practitioners who are expected to implement its guidance. The Welsh Government and/or Transport for Wales should work with the professional institutions and with cycling and walking groups to develop these communications and professional training programmes.

Document review

13. The document, and particularly its technical guidance, will need to be kept under review and updated periodically. In particular, the UK Government's forthcoming review of the Highway Code is expected to lead to changes in the rules governing pedestrian and cyclist safety and priority at junctions and crossing-points. These changes, if and when made, will allow the guidance to be updated to include junction and crossing designs that are currently difficult or impossible to implement in Great Britain. Publishing the document in electronic format will enable these and similar updates to be made, reflecting not only regulatory changes but also evolving best practice (e.g. in the light of experimental schemes which prove successful).

14. We urge the Welsh Government to consider the mechanism by which this updating can be carried out, and how stakeholders and experts can input to this process. The same mechanism could also be used to inform the review of the Act itself (something that must be undertaken by 2022).

Document format, structure, numbering and other details

15. An additional benefit of publishing the document electronically is that it would allow the use of hyperlinks to provide cross-references, thereby reducing some of the duplication referred to in paragraph 1 above.

16. Finally we note that there are a number of points of detail relating to the structure of the document, the numbering of diagrams, some missing diagrams, consistency of capitalisation and numbering formats, and spelling or grammar errors. The Equality Act 2010 is incorrectly referred to in several places as the "Equalities Act".

3. RESPONSES TO CONSULTATION QUESTIONS

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:

No. The guidance lacks clarity over the distinct purposes, and intended audiences, for parts 1 and 2. It needs to be clearer that:
--

- Part 1 is effectively an ‘Executive summary’, and is aimed primarily at decision-makers (councillors and senior officials)
- Part 2 contains the detailed technical guidance, and is aimed more at active travel practitioners.

This would result in Part 1 being further shortened, providing greater clarity and concision in setting out:

- the wider policy and legal framework relating to active travel that highway authorities need to be mindful of (see Chapters 2, 3 and 9, sections 10.2 to 10.6 and Appendix A, also our comments on these chapters and on section 8.2);
- the roles and responsibilities of different parts of a local authority in relation to active travel, including public consultation and engagement with other partners (see the above chapters and sections, but also Chapters 6 and 11); and
- the general principles of cycle and pedestrian network planning and design (see point 2 in our summary comments).

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 strongly welcome the statement in the above question that the duties of the Act are specifically about creating modal shift towards walking and cycling. However, regrettably, we do not feel the intended clarity not been fully achieved.

We suggest the guidance should go further by clarifying that ‘active travel’ supports the wider aim of halting and reversing the growth of motor traffic. Defining active travel in these terms would explain how active travel measures contribute to “all seven of Wales’s Well-being goals” (a point that is rightly noted near the start of the document) but also to tackling the climate emergency declared by both the Senedd and the Welsh Government (this is not currently mentioned in the draft).

Since the draft guidance was issued, the UK Government has issued “Decarbonising Transport: setting the challenge.” Its foreword, written by the UK Government’s Transport Secretary, sets out a 6-point ‘vision’, whose ‘point 1’ is that “*Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less.*” We urge Welsh ministers to make a similarly clear statement that the Active Travel Guidance’s aim is to contribute to a wider objective of halting and reversing the growth of road traffic, thereby helping to tackle congestion, pollution, road danger inactivity-related ill health, while creating a clean, healthy, safe and zero-emissions transport system for future generations in Wales. We also hope that the wider aim of traffic reduction will be reflected in the Welsh Government’s update to the Wales Transport Strategy, which is now under review.

The guidance should also set out how active travel can be supported by wider traffic reduction policies (e.g. various forms of congestion and/or pollution-based road user charging, parking charges). (See our comments on paragraph 12.1.1, table 5-1 and paragraph 14.6.1).

It should also spell out the need for developer contributions to support the aim of modal shift (see comments on paragraph 5.16.5), and the importance of gathering data through scheme monitoring arrangements to assess whether they are contributing to this aim (see comment on paragraph 20.2.1).

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. The separation of the ERM and the INM made some sense after the Active Travel Act first took effect, and there was a need to collect data on the baseline date on existing infrastructure. However from now on, the INM (or in future the ATNM) from previous iterations of the process can and should serve as a baseline for each subsequent iteration, demonstrating what progress has been made during the intervening years.

Combining the two would also overcome the mis-perception, created by the original ERM / INM process, that planning for active travel should largely be based on the assumption that existing active travel facilities can be taken as a useful starting point for future additions and improvements to the network. This is true to a reasonable extent for walking networks (they are generally extant and reasonably coherent, at least in urban areas, even if they are of variable quality), but far less true for cycling networks. On the whole, existing cycle networks were (and usually still are) very disjointed, poorly located and designed – indeed, some facilities are downright dangerous. It would be better to start the cycle network planning process on the assumption that it largely needs to be developed from scratch, with any existing facilities then being incorporated into the network plan where they are in fact useful, rather than the other way round.

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:

We welcome the updates cited. However we believe they could go further.

Firstly, as noted in answer to Q2, Part 1 of the guidance needs to refer to the need to halt and reverse motor traffic growth, the declarations of a climate emergency made by both the Senedd and the Welsh Government, and the UK Government's forthcoming Transport Decarbonisation Plan. It should talk about the wider traffic restraint measures that can contribute to active travel.

In terms of more specific policy linkages, we believe both Parts 1 and 2 should refer to:

- *Planned highway maintenance programmes.* The current draft notes that the Active Travel Act creates a duty for highway authorities to seek improvements for active travel in the context of highway maintenance (as well as highway construction and improvement works). Moreover, 17.6 rightly advises that certain improvements can be introduced at very low cost if implemented as part of a planned maintenance scheme. However the guidance should go further and recommend local authorities to proactively align their active travel and planned highway maintenance programmes, seeking opportunities to deliver active travel improvement schemes when carrying out planned highway maintenance works. (See our comments on paragraphs 9.2.2, 9.2.6, 10.3.2, 13.4.1 and (particularly) 17.6.2).
- *The Rights of Way Improvement Plan (RoWIP) process.* Chapter 2 (the ‘legislative context’ chapter) currently makes no mention of the duty on local authorities to develop and periodically update a RoWIP. Cycling UK wholeheartedly supports the distinction made in Chapter 4 between “active travel” and recreational walking and cycling (though we think it could be better expressed – see below). However, one cannot make such a clear-cut distinction between the physical infrastructure, i.e. between (a) active travel networks (which are predominantly in urban areas) and (b) rights of way (RoW) networks (which are predominantly rural). Indeed their purposes are particularly blurred in ‘urban fringe’ areas, where off-road walking and cycling routes can serve both to enable ‘utility’ journeys from outlying settlements into a town (e.g. pupils travelling to their nearest school), and to enable families living in a town to go out for walk or cycle rides in the surrounding countryside at the weekend. Where the RoW network serves this kind of dual purpose, it is particularly important that it is surfaced, lit and maintained to standards suitable for making utility journeys in all weathers at all times of year. The guidance needs to explicitly recognise this blending of ‘active travel’ and RoW networks, with funding arrangements being put in place to facilitate this blending. (See comments on paragraph 1.13 and section 4.1).

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:

We reiterate the need for the guidance to refer to local authorities’ duties to develop and periodically update Rights of Way Improvement Plans (RoWIPs) – see response to Q4 above.

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:

We broadly support Paragraph 5.6.4, though we suggest adding a definition of the term “mesh density” to the glossary. There is also a need to clarify whether “greater” means “more dense” or “a higher number” (the higher the number for the average spacing between active travel routes, the lower the density).

We also support the statements in paragraphs 10.2.3 (which says that ATMNs should “show the extent of the existing and planned routes for Active Travel within the built-up areas to be developed over a fifteen-year period) and paragraph 13.6.4 (which adds that ATNMs should “set out the plans of the local authority for the next 15 years”, with revisions being made “every three years to illustrate progress”).

Unfortunately the above paragraphs are undermined by paragraph 13.6.1, which suggests that “Local authorities may choose to try to create an area wide local network, or to focus initially on serving key areas (such as links to a town centre) or types of journeys, such as travel to school” (emphasis on the word “or” added).

We would agree that local authorities should of course be clear about their top priorities for the next 3 years – including the possibility of focusing initially on key areas or specific journey-types. However, if ATNMs are supposed to have 15-year time-horizons (as set out in paragraphs 10.2.3 and 13.6.4), they should set out aspirations to develop *comprehensive* local active travel networks – including attainment of the mesh density requirements of paragraph 5.6.4. They should *not* be limited to serving only a few key areas or journey types.

(For more, see our detailed comments on the paragraphs referenced above)

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:

Not applicable.

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

Please enter here:

We reiterate the observations made in our introductory summary of key points about:

- The need to clarify the process of network planning (particularly cycle network planning – and the role of the Propensity to Cycle Tool in the identification and prioritisation of key cycle network links;
- The need for clearer and more prescriptive language. We particularly seek clarity on the meanings of words like “must”, “should”; “could” and “may”, “desirable” minimum or maximum and “absolute” minimum and maximum. We also seek clarity on what constitutes “standards” for the purpose of section 3(6)(b) of the Active Travel Act. (see summary paragraph 7, our general comment on Chapter 4 and detailed comments on paragraphs 10.8.3 and 14.1.5.)

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:

Yes, we are satisfied that the design details reflect the current TSRGD 2016. However we continue to press for amendments to TSRGD and the Highway Code, to facilitate the adoption of design solutions which would afford greater priority and safety for pedestrians and cyclists at junctions and crossing-points (e.g. 'zigzag controlled zones' at junctions, and 'elephants feet' markings to continue cycle lanes across junctions). As and when these amendments are secured, this will enable and necessitate updates to the Active Travel design guidance. See paragraph 13 of our summary comments.

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:

We are happy with the banding of widths as proposed. However as noted previously (in response to Q8), we seek the inclusion of definitions for the terms "desirable" minimum or maximum and "absolute" minimum or maximum, and clarity on which constitutes "standards" for the purpose of section 3(6)(b) of the Active Travel Act – again, see our comments on paragraphs 10.8.3 and 14.1.5.

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:

'Cyclops' junctions – see <https://tinyurl.com/y5oacpj6>
Side-road zebras – see <https://tinyurl.com/y8zfrgnl>
'Elephant's feet' markings – see p26 of <https://tinyurl.com/y9grdn8x>

N.B. The design guidance will need to be kept under review, particularly in relation to the design of junctions and crossings. The UK Government's forthcoming review of the Highway Code – which is expected to commence shortly – is likely to facilitate the widespread adoption of junction and crossing designs that are common elsewhere in Europe, but which are currently either experimental or simply impossible in the UK. The Welsh Government should consider the mechanism for carrying out this review process, and indeed for reviewing the Act itself (this needs to be done by 2022).

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:

Although we are supportive of the aims of this requirement to undertake Equality Impact Assessments (EqIAs), we cannot be confident that the process will work as intended, given that paragraph 2.6.4 of the draft promises that guidance on carrying EqIAs is given in Appendix J, yet that is not the case.

To be effective, the EqIA process will need to strike a balance between prompting scheme designers to ask the right questions, without being so onerous that it becomes a burden on progress. It will be more important to carry out EqIAs on larger highway schemes than on schemes specifically intended for active travel, to ensure that these larger schemes do not adversely affect pedestrians or cyclists with protected characteristics (e.g. younger or older people, women, people with disabilities). The process will need to include consideration of the users of non-standard cycles.

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:

We assume this question relates to Table 11-1 in Chapter 20 (which provides a logic map to inform scheme-specific monitoring plans).

If the guidance is to advise authorities to monitor both ‘outcomes’ and the ‘impacts’ of schemes, it should explain the difference between these terms. It cites “*Reduction in incidence of accidents, congestion reduction*” as ‘impacts’, however we believe these are ‘outcomes’. The distinction either needs to be clarified, or dropped.

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

Please enter here:

We have many comments to make in our detailed line-by-line consideration of the guidance in Part 2 and design drawings in Appendix G. However we flag up the following key points:

- The ‘dynamic envelope’ shown in figure 3.10 is too small – the 600mm gap between the cyclist and overtaking car is insufficient even at low speeds.
- We do not agree that “coloured surfaces should be used sparingly”. We agree that its use is most important at points of conflict, e.g. at junctions. However it should

also be used wherever decisions are made to retain unsegregated cycle lanes and advance stop lines (though our preference is that such facilities should be progressively replaced with better forms of infrastructure, in accordance with infrastructure design principles outlined in paragraph 2 of our summary). For more, see our comments on paragraph 14.3.4.

- We believe the draft guidance takes an overly simplistic view of when it is and is not appropriate to provide for pedestrians and cyclists to share the same space (section 14.12). We agree that segregation of the two groups is generally preferable in principle. However the list of exceptions should also include any location where pedestrians are likely to be enjoying their surroundings (including children playing) rather than walking purposefully. In these locations, pedestrians are unlikely to pay attention to the distinction between pedestrian and cycle space, unless there are very high flows of cycle traffic. It is then better to make it clear to both groups that they should expect to share the space (e.g. through roundel markings and/or 'share with care' signs or similar, see Appendix K pages 450 and 451). This places the onus on cyclists to use the space respectfully and carefully, instead of creating frustration and antagonism by giving cyclists the perception that the cycle track portion of the facility is "theirs" and that pedestrians should not get in their way there. See comments on paragraph 14.12.5.
- The guidance needs to be clearer about whether 'hybrid' cycle tracks are in fact 'cycle tracks' or cycle lanes. Our understanding is that, if they are created from what was formerly carriageway space (rather than from footway space), they are legally 'cycle lanes', and require Traffic Regulation Orders accordingly (see paragraph 14.25.4).
- We suggest that the diagrams for bus stop bypasses should include gaps for cyclists to be able to leave the cycle lane / track ahead of the bypass if it is obstructed (as is often the case at busier bus stops).
- The guidance on bus lanes needs to state explicitly that cyclists should always be allowed to use bus lanes (including contraflow bus lanes), even though it should also call for the provision of segregated or light-segregated cycle facilities wherever these lanes are heavily used. It should also make it clear that narrow (<3.2m) bus lanes should only be used for short lengths, to avoid pressure on cyclists from buses waiting behind them to overtake.
- We disagree with the advice on median strips (paragraph 14.47 and DE041). There are invariably better uses for the road space (normally it would be better used for cycle facilities), and better ways to assist pedestrians in crossing the road.
- At Toucan crossings, far-side traffic signals are always preferable to near-side signals. (We also suggest this is also true for pedestrian-only crossings, and hence Ped-X crossings should be preferred to Puffin crossings).
- While we agree that it is generally pleasanter being on a bridge than in a tunnel, the trade-off is not as simple as this. The unpleasantness and insecurity of tunnels can be averted if they are wide and straight, allowing users to see daylight at the other side (it is narrow blind corners in tunnels that make them inconvenient and,

at times, frightening). Tunnels have the advantage that they require less of a height difference between the road and the walking / cycling facility (because pedestrians and cyclists require a lot less headroom than motor vehicles). Therefore, all other things being equal, tunnels require less ascending and descending than bridges.

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?

We assume the Welsh Government will follow its normal rules and procedures as regards translating the guidance itself. On that assumption, we do not see any specific issues relating to active travel that need raising.

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.

The guidance notes the requirement for completed ATNMs to be published both in Welsh and English (see paragraph 5.12.4), however it does not cover bilingual consultation. We suggest adding some text on consultation requirements in Chapters 6 and/or 11 (which both concern consultation and stakeholder engagement), setting out any advice or rules relating to consultations on ATNMs and on individual schemes.

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:

We have no further related issues to raise.

4. DETAILED COMMENTS: PART 1

Chapter 1: Introduction

General

This chapter needs to provide greater clarity on the purposes and intended audiences of Parts 1 and 2 respectively. It should be clear that:

- Part 1 is effectively an 'executive summary', aimed at councillors and senior officers. It can be referred to as meeting the Act's requirement for 'delivery guidance'.

- Part 2 contains the more detailed technical guidance aimed at practitioners. It can also be referred to as meeting the Act's requirement for 'design guidance'

We recognise that the above distinction between the intended purposes and audiences for Parts 1 and 2 is not entirely the same as the Active Travel Act's distinction between 'Delivery guidance' and 'design guidance'. We believe nonetheless that shifting towards the former distinction will work acceptably in terms of meeting the legal requirements. We also urge that the distinction between 'delivery' and 'design' guidance is reviewed when the Act itself is reviewed in 2021.

Paragraphs 1.1.5 and 1.1.6 in particular are very confusing.

Paragraph 1.1.1

After "... passed the Active Travel Act into legislation in 2013", insert a cross-reference to paragraphs 2.2.2 and figure 2.1, which set out the Act's requirements.

Paragraph 1.1.2

We understand the point of emphasising that people need to be able to make their "entire journey" by active travel in order to switch from the car. However, as worded, this precludes the option of making the entire journey by active travel in combination with public transport. We suggest saying something like:

"If they are to switch from cars, people need to be able to complete their entire journeys safely and easily by active travel, either on its own or in combination with public transport."

Table following paragraph 1.1.3

This needs to include a reference to Rights of Way Improvement Plans.

The reference to Planning Policy Wales (middle of p14) should cross-reference to paragraph 2.5.

Chapter 2 Policy and Legislative Context

General

This chapter should include references to:

- The powers and duties under the Road Traffic Reduction Acts 1997 and 1998;
- Legislative and policy commitments in relation to climate change: e.g. The Climate Change Act 2008, the Environment (Wales) Act 2016 and the carbon budgets set under that Act; the 1.5C target of the Paris Accord; the 'Climate Emergency' declarations made by the Senedd and Welsh Government, and the UK Government's forthcoming Transport Decarbonisation Plan.
- The Welsh Government's current air quality commitments under EU law and their potential replacement under the Environment Bill currently before the Westminster Parliament.

Paragraph 2.2.3

The goals of the Well-being of Future Generations Act could be more clearly brought out by highlighting the relevant words in the 7 bullet-points of this paragraph (i.e. “prosperity”, “resilience” etc).

The bullet-point on “prosperity” should also mention how active travel can help meet this goal by boosting retail vitality and footfall, and by reducing absenteeism due to ill-health.

Paragraph 2.2.5

Include a reference for this publication from the Future Generations Commissioner.

Paragraph 2.5.5

Amend the italicisation, to clarify which words are quoted from Planning Policy Wales, and which are not.

Section 2.6: Equalities

Here and elsewhere in the document, there are references to both ‘the Equality Act’ and the ‘Equalities Act’ 2010. The former is correct.

Paragraph 2.6.4

This paragraph promises that “*Guidance on carrying out Equality Impact Assessments is given in Appendix J of Part 2*”. However Appendix J provides no such guidance.

The EqlA process will need to strike a balance between prompting scheme designers to ask the right questions, without being so onerous that it becomes a burden on progress. It will be more important to carry out EqlAs on larger highway schemes than on schemes specifically intended for active travel, to ensure that these larger schemes do not adversely affect pedestrians or cyclists with protected characteristics (e.g. younger or older people, women, people with disabilities). The process will need to include consideration of the users of non-standard cycles.

Paragraph 2.6.6

We suggest placing the words “local authorities” before “should ensure”, rather than at the beginning of the sentence.

Paragraph 2.6.8

Include a reference to Wheels for Wellbeing, as a disability group who local authorities should seek to engage in dialogue over their equality duty.

Paragraph 2.7.2

The acronym ATNM needs to be spelled out here (Active Travel Network Map), as it has not appeared previously in the document.

The term “Strategic Case” is not defined in the document. It should perhaps be added to the glossary.

Chapter 3: The Duties on Local Authorities

Section 8.2: Review of the Act and

Chapter 9: Provision for Walkers and Cyclists when Changes are Made to the Highway

We suggest moving the above sections of the document to an appendix (though it may be preferable to move a few paragraphs from Chapter 9 to places in Part 2 of the document). In place of Chapter 3, sections 10.2 to 10.6 should be moved from Part 2, along with the first two sentences of section 10.7. The resulting chapter could be titled “*Legal duties of highway authorities: a summary*”. We discuss amendments to these sections of Chapter 10 when we come to them in their current position in the document.

The resulting Appendix could be titled: “*The Active Travel Act and related legislation.*” The first part of this appendix would consist of the text currently comprising Chapter 3. Its current chapter title could disappear altogether. However if it were retained, it should be amended to say “*Duties of Welsh Ministers and Local Authorities*”, to make it clear that this section only covers the Active Travel Act duties (other legal duties are covered in chapters 2 and 8), and also that it covers the duties of Welsh Ministers as well as local authorities. This appendix should then set out the duty of Welsh Ministers to review the Act and its effectiveness, (i.e. the text currently contained in section 8.2 of the document), followed by the current Chapter 9 (which sets out the other legal duties which intersect with the Act, namely the duties of highway authorities under the Road Traffic Regulation Act 1984, the Highways Act 1980, the New Roads and Street Works Act 1991 and the Traffic Management Act 2004).

We discuss amendments to Chapter 9 when we come to it in its current position in the document.

Chapter 4: Definitions

General

This chapter should also include definitions of:

- The terms ‘desirable’ and ‘absolute’ maximum and minimum;
- ‘Standards’, for the purpose of section 3(6)(b) of the Active Travel Act. We strongly believe that it should be the ‘desirable’ maxima and minima (rather than the ‘absolute’ minima and maxima) that should be defined as ‘standards’ for this purpose. Otherwise, the allowance made for ATNMs to include short sections which fall short of the standards would in effect be allowing for the inclusion of infrastructure which is not merely sub-standard but downright dangerous.
- Words such as ‘Must’, ‘May’, ‘Should’, ‘Could’ and their negative equivalents (“Must not” etc).

This introduction should also cross-reference the Glossary, where definitions for more technical terms can be found.

Section 4.1: Introduction

This section discusses the distinction between walking and cycling for ‘active travel’ (i.e. for purposeful journeys) and for leisure, a distinction we wholeheartedly support. It also recognises – correctly – that high quality active travel routes are also likely to attract significant levels of recreational use (even though this is not their primary purpose).

Hence it would also be worth some further discussion in this section of the relationship between Active Travel networks and rights of way network. After all, it is equally true that, whilst much of the rights of way network nowadays fulfils mainly a recreational function, some of it can also attract significant ‘purposeful’ travel, particularly in urban areas and around the urban fringe. Moreover it will often be important to prioritise spending on these ‘urban fringe’ links in the RoW network, so that they can be surfaced and lit to standards which facilitate their use for ‘active travel’ in all weathers and at all times of year.

Paragraph 4.1

We urge the addition of a sentence at the end of this paragraph, saying:

“Active travel supports the wider aim of reducing car travel.”

Paragraph 4.3.5

We agree that “equestrianism is overwhelmingly for leisure purposes rather than as a mode of transport”, and that it should therefore not be considered as ‘active travel’, Nonetheless, equestrians will often wish to use cycle lanes and cycle tracks, and their right to do so should be taken into account in planning active travel networks, particularly in ‘urban fringe’ areas, and in planning or designing inter-urban active travel links and crossings of major roads.

Chapter 5: Planning the Network

This chapter is too long. It should be seen more as an executive summary for senior decision-makers of the principles and key steps in network planning and delivery – i.e.

- Define the geographic scope (i.e. the area or areas to be covered);
- Identify key origins and destinations – including any new developments that have been proposed or implemented since the previous iteration of the network planning process;
- Consider the adequacy of existing infrastructure to facilitate active travel between these origins and destinations (this will involve reviewing the previous iteration of Active Travel Network Maps, and progress in delivering improvements since they were published);
- Prioritise the desire-lines where further improvements are most needed (e.g. using the Propensity to Cycle Tool);
- Consult on network plans and priorities;
- Seek approval of the resulting map;
- Adopt and publicise them;
- Integrate the ATNM with other plans and programmes (e.g. the authority’s local plan, its planned highway maintenance programme etc);

- Develop and design schemes which meet the identified desire-lines;
- Seek funding;
- Implement those schemes to high standards (there needs to be a very concise ‘executive summary’ of the principles of pedestrian- and cycle-friendly planning and design – n.b. the point made in section 5.1 about the need to plan for users of all ages and abilities etc is more relevant to design standards than to network planning per se);
- Monitor and review progress made, to inform the next iteration of the planning process.

Detail on how to carry out these steps (e.g. how to conduct consultation and with whom, or paragraphs 5.7.1 and 5.7.2 on the Welsh Government’s data management system) should as far as possible be moved to Part 2.

Paragraph 5.1.2

The reference to 2.5 miles is unhelpful. It is a high upper limit for regular walking journeys but it is low for regular cycling journeys. We suggest referencing 2.5 miles for walking and 8 miles for cycling. It should also be noted that this range will progressively increase over time, as electric pedal cycles (or ‘e-bikes’) become more common.

Paragraph 5.1.3

This paragraph is clumsily expressed. We suggest it is also too detailed to be included in Part 1, given our wish to see Part 1 shortened. However, if retained, we suggest deleting the sentence starting “instead” and replacing it with:

“Separation will often be unnecessary where these residential streets have low traffic volumes and speeds, allowing them to be incorporated (usually with little or no engineering) into the Basic Network (as defined in paragraph 14.4).”

Paragraph 5.5.6

We suggest adding “and planned new developments” at the end of this paragraph.

Paragraph 5.6.1

We do not understand the first sentence of this paragraph. It needs to be clarified.

Paragraph 5.6.4

We suggest that the term “mesh density” is either defined here or in the glossary (a definition is in fact provided in paragraph 13.6.3, but no cross-reference is provided to this). This paragraph should also be reworded to avoid causing confusion with the reference to a “mesh density no greater than 250 metres”. Does “greater” refer to the number ‘250’, or to the actual ‘mesh density’ (which is the inverse of the average distance between active travel routes, as given here by the number 250)?

Section 5.12: Publishing the Map

Paragraph 5.12.6 (which is about publicising ATNMs, so that the local population is aware of them) should be added into paragraph 5.12.1 (which is about publishing the maps). However this section needs to clarify that the purpose of publishing the maps is for planning purposes, i.e. to let the public, developers and others know what active travel routes exist and are planned. Although some local authorities may wish to derive maps from their ATNMs which help members of the public to find their way when walking and cycling, that is not the intended purpose of ATNMs.

Section 5.15: Continuous improvement

Paragraph 5.15.2 notes that “At the three-year review point, there should be a measurable difference between the existing routes on [the] previous map and those completed on the new one.” We suggest the guidance should require local authorities to highlight these differences, so that they are apparent both to the Welsh Government and to the wider public.

Paragraph 5.16.3

Delete the reference to the European Commission – it is no longer relevant.

Paragraph 5.16.4

In the second sentence, replace “may” with “should”.

Amend the last sentence to say:

“In this way, opportunities should be taken to create...”

Paragraph 5.16.5

As worded, this paragraph is unduly restrictive of how developer funding can be used. Should it perhaps begin with “Where section 106 contributions are used”, if this is in fact the legal requirement?

More importantly, this paragraph should end with the words:

“They should at the very least avoid disadvantaging walking and cycling, and should instead support the aim of promoting modal shift towards cycling and walking”

Chapter 7: Promoting Active Travel

Paragraph 7.1.1

Delete the words “active travel” and “related” on their second occurrence, as the repetition is unnecessary.

Chapter 9: Provision for Walkers and Cyclists when Changes are Made to the Highway

As noted previously, this chapter should be moved so that it appears in an appendix, after chapter 3 and section 8.2.

We also suggest retitling it, to say “*Provision for Walking and Cycling when Changes are Made to the Highway.*”

Paragraphs 9.2.2 and 9.2.6

We suggest inserting paragraph 9.2.6 after the first sentence of paragraph 9.2.2, prefaced by the words “As a minimum requirement”, and with “highways projects” replaced with “highway and traffic schemes”. The next sentence should then be prefaced with the words “Wherever possible though”, with the words “active travel” inserted before “provision”. Then the final instance of the word “*should*” should be replaced with “*must*”. This paragraph would therefore read as follows:

“The duty to enhance provision for active travellers when undertaking highway construction, maintenance or improvement is a fundamental component in the construction of the active travel integrated networks. As a minimum requirement, highway and traffic schemes in Wales must not make walking and cycling less convenient or safe. Wherever possible though, highway authorities should seek to enhance active travel provision, unless they can demonstrate good reason not to.”

Next, insert a paragraph break. Then, after the current conclusion of this paragraph (i.e after the words “earliest design considerations”), insert the following:

“This includes planned maintenance schemes. Highway authorities should seek to align their walking and cycling programmes with planned highway maintenance works. This would enable cycling and walking improvements to be made at the same time as highways are being resurfaced. This could achieve significant reductions in costs and in disruption for road users.”

Paragraph 9.2.8

Amend “Local authorities” to say “Highway authorities”. This paragraph should also apply to the Welsh Government when it is acting as a highway or traffic authority.

5. DETAILED COMMENTS: PART 2

Chapter 10: Part 2 Introduction

Paragraph 10.1.2

We reiterate our comments on, and proposed amendment to, paragraph 1.1.2 (whose text is identical to this paragraph).

Table 1-1

Amend “highways, footpaths and bridleways” to say “highways (including footpaths and bridleways)”, bearing in mind that footpaths and bridleways are kinds of highways.

Paragraph 10.3.2

After “highway schemes”, insert the words:

“(including planned highway maintenance works)”.

Then at the end of this sentence, replace the words “traffic management” onwards to say:

“traffic management schemes, road safety schemes and new developments.”

Paragraph 10.8.3

The ‘Standard Details’ referred to in this paragraph, and set out among the ‘Design Elements’ of Appendix G, contain dimensions that are variously described as “preferred”, “desirable”, “accepted” and “absolute” maximum or minimum dimensions. It is therefore unclear which of these are to be regarded as “standards” for the purposes of section 3(6)(b) of the Active Travel Act. There is an evident need for clarity and consistency over the definitions of these terms.

We urge that “desirable” maximum and minimum standards should be those which should not be breached unless a site-specific justification is recorded on the Active Travel Network Map. “Absolute” maximum and minimum standards should be those that must never be breached in any circumstances, as these are the thresholds beyond which sub-optimal standards cross over into being downright dangerous. See also our comment on paragraph 14.1.5.

Chapter 12: User Needs

Paragraph 12.1.1

Replace the paragraph’s final sentence with:

“Reducing traffic volumes and/or speeds, through measures such as the wider adoption of 20mph limits, closing roads to through-traffic, physical and visual traffic calming techniques, streetscape improvements and the creation of ‘low traffic neighbourhoods’ can benefit both active travel modes. So too can wider demand management measures, such as road user charging, parking charges and the reallocation of road and parking space.”

Paragraph 12.1.3

Replace the paragraph’s final sentence with:

“However as the number of pedestrians per unit of path-width increases, it becomes increasingly important to separate the two groups, so that both groups can travel without concerns over conflict – see paragraph 14.9.7.”

We also propose including the table from the Dutch CROW guidance, which shows these thresholds, and the solutions that are possible between these thresholds [n.b. it is table 20 in the 2007 edition, we are currently unable to check the 2017 edition].

Paragraph 12.1.4

After “typically up to 5 miles for regular utility journeys”, add:

“Or up to 8 miles where electrically assisted cycles (or e-bikes) are used.”

(n.b. Various studies suggest that the use of e-bikes increases average trip lengths by 55%-60%.)

Also, add “*rapidly*” before “*increase*”, and delete the words “*and extend*” (it’s not clear what these words mean – alternatively, their meaning should be clarified).

Paragraph 12.2.1

There is evidently some text missing from the end of this paragraph, making it hard to comment on it. However the reference to separating people walking, cycling and wheeling should make the point that this is increasingly necessary as the numbers of pedestrians and cyclists in a given area of space increases.

Paragraph 12.4.10

Replace “*fast vehicle routes*” with “*fast or heavy vehicle flows*”.

Paragraph 12.4.15

Whilst we understand the concepts of streets having ‘place’ or ‘movement’ functions, we suggest these terms may need explaining for some readers.

Paragraph 12.5.2

Reword this paragraph as follows, in line with our proposed definitions of “normal” and “absolute” minimum widths:

“Pedestrian routes should have a normal minimum width of 2.0m clear of obstructions, allowing two wheelchair users to pass one another. Where physical constraints make this impossible, a minimum clear width of 1.5m should be maintained, to enable a wheelchair user and walking companion to travel side by side. This can reduce to an absolute minimum of 1.2m for point-based obstructions only, where these cannot be moved. This provides space for a blind or partially sighted person to walk using a long cane, or with a guide dog, or alongside a person providing guidance.”

Text accompanying figure 3.6

Insert “*young,*” after “*inexperienced,*”.

Paragraph 12.11.1

We suggest rewording this, to give greater priority of emphasis to the factors which local authorities can address to minimise cycling effort, rather than those which they can do little or nothing about (i.e. gradients and strong winds). For instance:

“Aside from gradients and strong winds (which obviously affect the effort involved in cycling), other factors which can increase the energy required to cycle include...”

Table 3-2

In the line relating to “*Surface quality*”, replace “*The greater the surface resistance*” with “*The more uneven the surface*”. It is lack of constant contact between the tyre and the road surface that makes it inefficient (as well as uncomfortable) to cycle on uneven surfaces.

Paragraph 12.12.3

This paragraph notes that “*A ‘Standard Inclusive Cycle’ has been defined...*” We suggest providing a reference to this definition.

Table 3-4

Several of the “typical desired speeds” given in this table for different cycle user types seem low. For instance, it gives a speed-range of 5-15mph for school travel and leisure. At 5mph a bicycle is unstable. The slowest cyclists rarely maintain speeds of less than 7mph, as this is very difficult to do (unless they have stabilisers). We suggest a range of 8-15mph for school travel and 8-25mph for leisure, bearing in mind that some leisure cyclists are fast riders. Similarly the top end of the range for adult commuting (10-20mph) should also be extended up to 25mph.

Table 3-5

The terms “Desirable”, “Preferred” and “Absolute” in this table (and elsewhere) need to be defined – see comments on paragraphs 10.8.3 and 14.1.5.

Table 3-6

Should this table not also provide ‘absolute’ (as well as ‘desirable’) maximum gradients?

Figure 3-10

The gap between a cyclist and a car passing them should be at least 1.5m, and at least 2.0m at speeds above 30mph.

Paragraph 12.18.2

At the end of the sentence stipulating a “desirable minimum width requirement of 3.0m for two-way cycle tracks”, add “with additional width required if the track is adjacent to a small or large vertical upstand (e.g. a kerb or a wall respectively) on one or both sides”.

Paragraph 12.18.4

After the concluding words “Kissing gates should not be used on cycle tracks”, add:

“... and should be progressively removed on bridleways which form part of an active travel network.”

Paragraph 12.19.1

This should be amended to make it clear that 2.0m is the “normal minimum width”, and 1.5m is the “absolute minimum width”, for with-flow cycle lanes, with 2.0m being the “absolute minimum width” for contraflow cycle lanes.

Paragraph 12.19.2

The word “generally” should be deleted from this paragraph. Narrow cycle lanes (<1.5m) should never be used.

Paragraph 12.21.5 and 12.21.6

The primary position should be described first. Therefore the first sentence of paragraph 12.21.5, should be replaced by the following:

“Cyclists are advised to adopt the primary position, riding in the centre of their traffic lane, when they can keep up with other traffic, or when no traffic is trying to overtake them, or when overtaking would be unsafe (including at the approaches to junctions, on narrow sections of road, or when approaching junctions or corners). This maximises their ability to see and be seen by other road users, while reducing the risk of inappropriate overtaking manoeuvres, particularly in safety-critical situations. They should adopt the secondary position when motor vehicles wish to overtake them, providing it is safe to allow them to do so. This means positioning themselves at least 1m to the left of the traffic stream but no less than 0.5m from the kerb or from any parked car doors”.

Then retain the second sentence of this paragraph, deleting paragraph 12.21.6.

Paragraph 12.22.1

Delete from the start of this paragraph to the word “unless” and replace with:

“Traffic lanes of less than 3.0m or more than 4.0 should be used wherever cyclists are expected to share with motor vehicles (i.e. where there is no separate high-quality cycle track). Lane widths in the critical range of 3.2m to 3.9m should be avoided unless”

Paragraph 12.22.3

Delete from “(or adjacent cycle tracks)” to the end of the paragraph and replace with:

“or preferably cycle tracks, with cycle tracks being required on roads with higher traffic volumes or speeds.”

A cross-reference should then be provided either to our proposed summary of key principles for cycle link design (see paragraph 2 of our summary comments), or to paragraph 14.3.1, amended to reflect our comments on that paragraph.

Paragraph 12.22.4

Delete everything after the words “but this width” to the end of the paragraph, and replace with:

“is unsuitable for on-carriageway cycling unless traffic volumes and speeds are low. It should therefore be avoided on Active Travel Routes with higher traffic volumes or speeds – and in any new highway schemes – unless segregated cycle lanes can be provided.”

Paragraph 12.22.8

Add the following at the end of this paragraph:

“Narrow streets and lanes with high traffic flows should have traffic management measures applied to reduce traffic volumes, potentially by eliminating motor traffic or through-traffic altogether.”

Paragraph 12.23.3

This paragraph needs to include a cross-reference to the definition of “the dynamic envelope of a cyclist” provided in figure 3.10, to make it clear that this includes some clear space around the cyclist, and not just the physical space a cyclist occupies while in motion.

Page 102

At the end of the paragraph outlining the requirement for cycle networks to be “coherent”, add the following:

“Junctions should be designed to with the needs of all possible cyclists’ turning movements in mind, i.e. it should not be assumed that cyclists will simply follow a designated ‘cycle route’.”

Chapter 13: Network Planning

Paragraph 13.2.1

If our proposal is adopted to move the legal requirements sections to an appendix (see our comment on Chapter 3, Chapter 9 and section 8.2), the cross-reference in this paragraph will need to be amended.

Section 13.3: Showing Proposed Routes on the Active Travel Network Map and Section 13.4: Integration with Policies, Plans, Programmes and Infrastructure

We suggest moving these sections to go after sections 13.5 and 13.6 on network planning for walking and cycling respectively.

Paragraph 13.4.1

After “existing functions of the urban network”, insert the words “including the authority’s planned highway maintenance programme (see paragraph 17.6.2)”.

Figure 4.1

We are unable to comment on this figure, as it is unreadable.

Paragraph 13.5.3

After “taking place”, insert the following:

“or where they are not taking place due to potentially surmountable obstacles (e.g, major roads, railway lines or rivers), or where they may take in the future due to new developments.”

Paragraph 13.5.6

The first sentence should be split into two sentences, with a full stop after “importance of routes”. The words “Where available” should be deleted from the start of this sentence and placed instead at the start of the (new) second sentence (i.e. before the words “This may also be used”).

Paragraph 13.5.7

After the words “(e.g. shortcuts across wasteland or car parks),” insert “or which require crossings to be provided across barriers such as major roads, railway lines or rivers.” The sentence should end at this point, with the next sentence beginning, “Consideration should also be given to any forthcoming new developments...”

Paragraph 13.5.13

This paragraph starts, “The walking audit tool should be used” – but where is this walking audit tool? A (cross-)reference is needed.

Figure 4.2: Stage 1 and Paragraph 13.6.1: Stage 1

It is entirely unhelpful to suggest that Stage 1 of the cycle network planning process involves “Establishing network aims,” then clarifying this by saying that “Local authorities may choose to try to crease an area wide network or to focus initially on servicing key areas (such as links to a town centre) or types of journeys, such as travel to school” (emphasis added). This should emphatically not be seen as an either/or decision. It is entirely reasonable that local authorities may wish to define some early priorities for their local networks. However, other statements in the guidance make it clear that Active Travel Network Maps should set out a 15-year vision for delivering comprehensive local

networks (see paragraphs 10.2.3 and 13.6.4). So, although local authorities might well decide to focus initially on specific localities or journey-types, this should not be seen as an alternative to defining a longer-term vision, but merely as a first step towards it.

Figure 4.2: Stage 3

This should mention the Propensity to Cycle Tool (pct.bike), as a key tool for identifying and prioritising desire-lines for cycling journeys. For more, see comments on paragraph 13.6.14 below.

Paragraph 13.6.6

This paragraph should be amended to make it clear that the attribute of 'attractiveness' is also a factor in network-planning (alongside 'coherence' and 'directness'), and is not just relevant to scheme design.

Table 4-2

Line 4 says "(see Stopping Frequency above)", as does the third-from-bottom line of the table. It is unclear what this is referring to.

In the second paragraph (relating to the principle "*Avoid Complex Design*"), delete either "*self-explanatory*" or "*self-evident*", as this is tautologous. Alternatively, if these terms are intended to mean different things, they need to be explained. This same paragraph appears over the page against the principle of "*Safety*". This appears to be an error.

In the first of the two bullet-points at the bottom of page 119, replace "*speed reduction across side roads*" with "*speed reducing features at side road junctions, such as raised tables and tightened angles.*"

Against the key requirement of '*Comfort*', there should be some text about avoiding gradients, upstands and uneven surfaces.

The principle of '*Wayfinding*' should be related to the key requirement of '*Coherence*' rather than '*Comfort*'.

The key requirement of '*Attractiveness*' should include text on the value of providing links to and through green spaces such as parks and open spaces, canals and riversides.

Paragraph 13.6.14

Delete "*National*" before "*Propensity to Cycle Tool*".

In England, the PCT now includes data on potential school trips as well as commuting trips. This means the PCT can now propose much more fine-grained cycle network plans, reflecting more local journey needs, rather than the more radial patterns which result from just using commute trip data. We strongly urge the Welsh Government to collect similar school trip data for Wales and to incorporate this into PCT, so that Welsh local authorities can use it to inform their next ATNM proposals. Networks which enable active travel both for commuting and for school travel are also likely to enable most other local trip types as well.

Paragraph 13.6.26

We do not accept that the analysis for the forthcoming iteration of the ATNM process should “not produce a fine grain network plan of a density of 250m mesh width.” Elsewhere, the guidance is very clear (in paragraph 10.2.3) that ATMNs should “show the extent of the existing and planned routes for Active Travel within the built-up areas to be developed over a fifteen-year period. Similarly, paragraph 13.6.4 adds that ATMNs should “set out the plans of the local authority for the next 15 years”, with revisions being made “every three years to illustrate progress”. We would entirely agree that early iterations of the ATNM process should highlight early priorities. However this should not be the exclusive focus of ATMNs. These early priorities should be set out as the first step towards realising a 15 year vision for comprehensive local networks (n.b. this point is also well made in paragraph 13.9.1).

Paragraph 13.6.28

We do not accept the statements that “generally schools have local catchment areas”, and hence that “only links within those catchment areas need to be considered”. These statements may be largely true for primary schools, but not generally for secondary schools. Secondary schools tend to be much larger, they typically have much wider catchment areas, and there is huge untapped potential to increase cycling as a means of reaching them. Larger schools need to be viewed as really important nodes in Active Travel Network Maps.

We reiterate our call for the Welsh Government to collect data on school travel patterns and to integrate this into the Propensity to Cycle Tool – see also our previous comments on paragraph 13.6.14.

Paragraph 13.6.32

In the first bullet-point, we suggest replacing “(or will be)” with “(or which have the potential to be)”. We would not wish the wording of this sentence to be used to argue against the inclusion of routes with high cycling potential in the ‘primary’ route network.

Figure 4.4

The top central box asks whether a routes “meet[s] the minimum design score of 70%”, while the bottom left box talks about routes where “the cycle route audit identifies a critical fail.” However there is no explanation of how these assessments are made. A cross-reference is needed to the scoring method in Appendix H.

The bottom line of this figure shows that if a route is “unsuitable for inclusion on the ATNM”, the next step is to “consider [the] next most direct alternative route and repeat the process”. However the process should only be repeated up to a certain maximum threshold of indirectness. Based on the Dutch CROW guidance, we suggest this should be that a route should be no longer than 1.4 times the ‘crow flies’ distance. Beyond this, the process flowchart should invite planners to reconsider routes that had previously been rejected, and to assess whether in fact it is possible to overcome some of the obstacles to making them acceptable as routes for active travel, even if this entails higher costs.

Paragraphs 13.9.1 and 13.9.4

We strongly agree with this paragraph (as noted in our earlier comments on paragraph 13.6.26). However, whilst there is a strong justification for seeking to develop active travel networks in areas of deprivation or public health, new cycle facilities in these areas are unlikely to be well-used initially, i.e. these are areas where it is usually not as simple as “build it and they’ll come”. Hence it must be acknowledged that the (entirely correct) advice in paragraph 13.9.4 to be guided by “*opportunities for ‘quick wins’ that demonstrate progress*” will tend to favour investment in more affluent areas and/or those with student populations – even though this will unfortunately tend to exacerbate (at least initially) the inequalities in active travel provision and usage.

Active travel infrastructure is always worth complementing with behaviour-change initiatives such as cycle training in schools, workplaces and community groups. However it is particularly important to invest in behaviour change programmes in areas suffering from economic deprivation and poor health, even if these areas are not initially due to benefit from infrastructure investment (given that, regrettably, these are exactly the areas where infrastructure investment is least likely to yield ‘quick wins’). Even though behaviour change programmes alone are only likely to achieve modest increases in active travel, the resulting health benefits in these areas can still be very significant. Moreover, by overcoming the cultural and awareness barriers to the uptake of active travel, these programmes can really help maximise the health and other benefits from subsequent investment in infrastructure.

Chapter 14: Design for Walking and Cycling and Appendix G: Design Elements

As there is often an overlap between our comments on paragraphs in Chapter 14 and the corresponding Design Elements in Appendix G, we have combined our comments, taking them in order of the relevant passages in Chapter 14.

Paragraph 14.1.4

This should presumably precede the three preceding paragraphs, showing the symbols for the 3 types of design details.

Paragraph 14.1.5

We welcome the statement that “authorities should also provide justification to Welsh Government where a scheme included in an ATNM cannot meet the desired standard”. We urge though that the implications of this statement should be spelled out more clearly, namely that the ‘desirable’ maximum and minimum standards are to be treated as ‘standards’ for the purpose of section 3(6)(b) of the Active Travel Act. This would ensure that departures from the ‘desirable’ standards are not routinely undermined, and that instead departures from these standards must always have a location-specific justification, which is recorded. ‘Absolute’ maximum or minimum standards should not be breached in any circumstances, as this is the threshold beyond which sub-optimal becomes downright dangerous.

Paragraph 14.2.3

We fully support the sentiment behind this paragraph but believe it needs to be expressed in much more positive terms. The aim of community-led street initiatives is more than simply *“that the streets are not just for moving traffic and accommodating car parking”*. This gives the unfortunate impression that other aspects – i.e. making the streets *“safer, more sociable more attractive for businesses and better to live in”* – are still secondary to the movement of traffic and the parking of vehicles.

We therefore suggest that this paragraph is reworded to clarify that the aim is unequivocally to tip the balance between ‘place-based’ activities (children playing, neighbours socialising etc), and the movement and parking of vehicles, with the latter becoming a lesser priority.

Paragraph 14.3.1

An essential ‘design consideration’ for active travel routes is that they need: EITHER to have low traffic volumes and speeds – or to be entirely motor-traffic free; OR to have segregated cycle facilities if traffic volumes and/or speeds are not low enough for people of all ages and abilities to cycle on them safely and without fear.

At the network-planning stage, decisions need to be taken about which of these basic kinds of active travel facility will be provided, on all links in the proposed active travel network.

Paragraph 14.3.4

Cycling UK disagrees with the suggestion that *“coloured surfaces should be used sparingly”*. On the contrary, coloured surfacing should be the norm where there are designated cycle facilities on roads or sections of road (including at junctions) where they cannot be physically separated from motor vehicles.

We agree that the priority for coloured surfacing should be to apply it where cycle lanes or tracks cross the mouths of junctions, at other crossing points and on advance stop lines which are not expected to be removed in the short term. However we would argue that, if an authority proposes not to provide segregation on a road with even moderately high traffic volumes, then the unsegregated cycle lane should have coloured surfacing. There is good evidence that coloured surfacing significantly reduces the number of drivers who encroach into cycle lanes.¹ Coloured surfacing also acts as positive promotion for cycling.

The fact that red is *“widely used in Wales”* should be sufficient justification for making this the standard colour for all future coloured surfacing (though we would not seek the immediate resurfacing of facilities which are already surfaced in other colours).

Paragraph 14.4.1

After *“and destinations within a settlement”* add *“and other settlements nearby”*.

¹ McKeown J. *The effect of coloured surfacing on drivers’ compliance with cycle and bus lanes*. Napier University, 2006 (see www.spokes.org.uk/wp-content/uploads/2010/05/0605_mckeownJohn_Napier_dissertation.pdf)

Table 5-1

This table of measures that can achieve reductions in traffic volumes and speeds should include:

- Road user charging: clearly this is a town-wide or city-wide measure, but it can achieve area-wide reductions in traffic volumes that can facilitate the wide-spread introduction of protected cycle lanes that might otherwise be undeliverable. It can also yield the funding needed to implement those lanes, while the cycle lanes themselves obviously provide an alternative means of transport for those deterred by the charges
- Parking charges or the removal of parking altogether. These measures can reduce demand for motorised travel, while also freeing up road-space that can enable protected cycle lanes to be delivered.

Paragraph 14.6.1

Here too, reference should be made to the value of road user charging and parking restraint (by increasing charges or removing spaces) as measures that will benefit cycling and walking.

Paragraph 14.9.7

After the first paragraph (which should end “can therefore be contentious”), delete the word “However,” at the start of the next sentence and replace with:

“Problems can start to arise where the density of pedestrians exceeds 100 people/hour per metre of available width, but only become intractable at densities above 200 people/hour per metre (this being the threshold beyond which pedestrian demand exceeds the amount of space needed for safe and comfortable cycling and walking conditions. Below this threshold,”

We also suggest including the table from the Dutch CROW guidance which sets out the relevant thresholds and the range of solutions that are possible at pedestrian densities below 200 people/hour per metre [n.b. it is Table 20 in the 2007 edition, however we are currently unable to check the 2017 edition].

Paragraph 14.9.10

At the end of this paragraph, add: “, even if only for deliveries.”

Paragraph 14.11.4

Expand the bullet point which says “physically separating cyclists from motorised traffic” by preceding it with the following words:

“Reducing the volumes and/or speeds of motor traffic to a level which allows people of all ages and abilities to cycle in comfort and safety – or, where this cannot be achieved...”

Paragraph 14.11.5

Expand the second bullet point to say:

“Providing good lighting, and surfaces which are smooth and well maintained (including regular clearance of vegetation and debris, and of snow and ice in winter).”

Paragraph 14.12.3

Replace the word “preferred” with “generally preferred (but see paragraph 14.12.5)”.

Paragraph 14.12.5

We support the “general” preference for segregation between pedestrians and cyclists. However we suggest adding the following to the bullet-point list of criteria to be considered in deciding whether to provide segregation in specific cases:

“Whether people are likely to be walking in a purposeful or leisurely manner. In parks and open spaces, where children are likely to be playing and pedestrians are likely to be chatting, enjoying their surroundings etc, they cannot be expected to respect white lines intended to separate pedestrians and cyclists. In these situations, white lines will only work if there are significant volumes of cyclists. Otherwise, they merely create conflict by giving cyclists the impression that the cycle track is ‘their’ space, without adequately raising pedestrian awareness of this. In these situations, it is normally preferable to permit shared use, with signing and/or surface markings (such as the roundel marking or ‘share with care’ sign shown in Appendix K) which make it clear that cycling is permitted but that the onus is primarily on cyclists to respect the safety of pedestrians.”

Cycling UK advocates that the legal definition of the traffic sign for shared pedestrian / cycle facilities should be amended so that its standard meaning is that cyclists have primary responsibility for respecting the safety of pedestrians. This would help overcome a common objection to shared use facilities, even in circumstances where there is adequate width and sightlines for safe and comfortable shared use, and/or where white-line separation is unlikely to work.

Paragraph 14.12.6

It is true that cyclists would be “less likely to encounter pedestrians engaged on ‘exchange’ activities – e.g. playing, shopping” where segregation is “effective”, i.e. where it keeps pedestrians off the cycle facilities altogether. However such regimented segregation is likely to be problematic in other ways, creating barriers to both pedestrian and cycle movement. Less effective segregation (e.g. white lines) do not prevent incursion by playing children or indeed by adult pedestrians who are simply chatting or enjoying their surroundings. In situations where children will be playing, or adults relaxing, it is normally better to avoid segregation altogether, unless cycle flows are very high.

Paragraph 14.12.8

Another advantage of unsegregated routes is that:

“Where walking is leisurely or where children are likely to be playing, unsegregated facilities make it clear to cyclists that the onus is on them to respect the comfort and safety of pedestrians, rather than treating the cycle track as ‘their’ space.”

Cycling UK believes that the legal definition of shared use signs should include placing the onus of responsibility primarily on cyclists to respect the safety of pedestrians.

Paragraph 14.13.1

Achieving segregation between pedestrians and cyclists through height-differences is only sensible along sections of a route where both pedestrian and cycle movement is overwhelmingly linear. In any situation where pedestrians or cyclists are likely to want to cross, join or leave the route at points along it, height differences are an impediment to both cycle and wheelchair users. We urge an amendment to this paragraph to clarify the limited circumstances in which height differences should be used.

Paragraph 14.13.2

We agree that segregation solely by white lines is problematic for blind and partially-sighted users and should therefore be avoided. However it is too simplistic to say that segregation by raised white delineator “is rarely respected by pedestrians, unless cycle flows are high or there is generous width, and should not normally be used.” The alternative, of segregation by height difference or other physical obstacles (e.g. hedges) limits the movement of both cycle and wheelchair users who may want to cross, join or leave the track at points along it. We therefore believe the raised white delineator should be more widely used than this paragraph implies, namely in any situation where flexibility of movement is needed, but where there is not such a lot of ‘leisurely’ use (including children’s play) that an unsegregated facility would be preferable.

Figure 5.5

This photo shows a terrible facility. Not only is it unclear why a shared use cycle track has been provided in this situation, but it also shows cyclists and pedestrians being forced to give way at a widely bell-mouthed junction, with their backs turned to the traffic whose path they are about to have to cross. This photo should absolutely not be used, other than as a representation of what NOT to do!

Paragraph 14.17.5

We reject the suggestion that, when deciding what form of cycle provision to make alongside highways, consideration should be given to “*the type(s) of cycle users*”. This is at odds with the advice to avoid “dual networks” (i.e. to provide for more confident users in some places and less confident users in other places – see paragraph 12.14.2). All active travel routes should be designed with all types of cycle user in mind. Routes should therefore consistently aim to meet all five criteria of being Coherent, Direct, Safe, Attractive and Comfortable (see paragraph 12.1.2). So for instance, it is not acceptable

to provide some routes that are direct but unsafe (assuming that these will be used by confident cyclists) and other routes that are safe but indirect (for less confident cyclists).

DE006 (relates to section 14.20, Reducing Traffic Volumes and Speeds)

Road humps are not an ideal form of traffic calming: they can generate objections from residents (as they encourage stop-start driving and a resulting revving of engine noise) and emergency services. They can also be uncomfortable for cycling. However this discomfort can be minimised – while maintaining their effectiveness at reducing vehicle speeds – by using speed humps of a sinusoidal profile. Hence the guidance is right to support their use where road humps are the preferred solution.

The ‘key features’ text rightly notes that the sinusoidal profile is difficult to construct. It should also note that precast sinusoidal profile paving blocks are available. However these are best avoided on routes that also carry significant volumes of heavy vehicles (i.e. buses or lorries), as paving blocks are more likely to come out of position under their weight.

Paragraph 14.25.4

In line 1, replace the word “may” (before “be supported”) with “should”. Then in line 3, delete “driving or”.

When a mandatory cycle lane (MCL) is installed, there is now no need for a separate traffic regulation order (TRO) to prohibit driving in the MCL – that is covered by the default meaning of the MCL white line marking. However they still require a separate TRO to prevent parking, and this should not be seen as optional. Since DfT amended the regulations on MCLs in 2016, a MCL without a separate parking restriction is now (regrettably) pretty much worthless – see www.cyclinguk.org/blog/underhand-law-change-undermines-mandatory-cycle-lanes.

Paragraph 14.25.5

To clarify the circumstances where mandatory cycle lanes should be preferred to advisory lanes, we suggest replacing the words “*where possible, and should...*” with:

“Except where the narrowness of the road makes it impossible to install a cycle lane without allowing vehicles to encroach into it when no cyclists are present. Parking restrictions should...”

DE013 Mandatory Cycle Lane (relates to section 14.25, Cycle Lanes)

For similar reasons (i.e. to explain the limited circumstances in which mandatory cycle lanes might not be possible), delete the words “*particular local circumstances*” in the ‘Measure and Brief Description’ box, and replace with:

“width constraints which mean that vehicles will sometimes need to enter the lane when cyclists are not present”

In the ‘key design features’ section, replace “*may*” with “*should*”. There is little point having a mandatory cycle lane unless it includes parking restrictions.

The last two bullet-points can be combined, as follows:

“Mandatory cycle lanes and the associated TROs preventing parking and loading should preferably operate at all times.”

In the fourth bullet-point of *“Other considerations”*, the words *“unlikely to be”* should be replaced by *“not”*. Mandatory cycle lane widths should never be less than 1.5m, as this is simply unsafe.

DE014 Advisory Cycle Lane (relates to section 14.25, Cycle Lanes)

We suggest combining the last two bullet-points of *“Key Design Features”*. The resulting bullet-point should read:

“TRO not required for advisory cycle lane, however a TRO should be introduced to create parking and loading restrictions, and should preferably apply at all times.”

The words *“unlikely to be”* (in the fourth bullet-point of *“Other considerations”*) should be replaced by *“not”*, for the same reasons as in DE013.

Paragraph 14.25.6

We are not aware of evidence to support the claim that *“raised thermoplastic markings can be used to help deter incursion by motor vehicles”*. Thermoplastic markings are much more suitable for segregating pedestrians and cyclists on off-road routes in a way that can be detected by blind and partially sighted users, without undermining the flexibility of movement for cycle and wheelchair users (see our comments on paragraphs 14.13.1 and 14.13.2).

Figure 5.13

We suggest using a photo of a light-segregated lane created with traffic wands rather than armadillos. Armadillos are a hazard for both motorcyclists and pedestrians (particularly blind or partially sighted pedestrians, for whom they represent a trip hazard) and provide only a limited sense of protection for cycle users. Wands provide greater perceived security for cycle users, without the risks to motorcyclists and pedestrians.

*DE018, Cycle Lanes With Light Segregation; and
DE019, Cycle Lane With Light Segregation at Side Road*

For the same reason as above, we suggest that both DE018 and DE019 should show traffic wands rather than armadillos.

DE021 Stepped Cycle Track (relates to section 14.30)

We suspect that the titles of both section 14.30 and DE012 should refer to *“Stepped cycle lanes or tracks”*. As we understand it, a stepped cycle facility is a ‘cycle lane’ if created from carriageway space, but a ‘cycle track’ if created by converting part of what was previously the footway (see also the comment on DE022). It goes without saying that conversion of the carriageway is normally preferable.

For this reason, we think it is necessary to add the words “*where the lane is created from carriageway space*” in the ‘Benefits’ section, after the words “*No TRO is required*”.

DE022 Stepped Cycle Track at Side Road (relates to section 14.30)

Again, we suspect that this should be titled to say “*Stepped Cycle Lane or Cycle Track at Side Road*”. Our point is reinforced by the statement (in line 1 of the supporting text) that “*Hybrid tracks are still considered part of the carriageway*”. If that is the case, they are cycle lanes, not cycle tracks (though this would not be true if the hybrid track had been created by converting part of the footway).

DE023 Cycle Track Alongside Road, Separated From Pedestrians (relates to section 14.31)

Under “*Measure and Brief Description*”, at the end of paragraph 1, delete the words “*the last resort*” and replace with “*avoided*”. This sentence already includes the caveated word “*most*”, making it clear that the general principle of not converting footways to shared use cycle tracks is not an absolute rule. The final words of this sentence therefore do not require any additional caveating. Shared use paths in urban areas should simply be “*avoided*”. They are very rarely acceptable, and only where there is ample space alongside faster or busier roads, with little pressure on the footway space. They should certainly not be accepted “*as a last resort*” where space is constrained.

At the end of paragraph 2 under “*Measure and Brief Description*”, it is not always true that pedestrians will usually fail to observe white lines separating the ‘footway’ section of the pavement from the ‘cycle track’ section. This is more likely to be true in parks, open spaces and other places where pedestrians are likely to be walking in a leisurely manner, conversing with one another, or where children may be playing. However, alongside roads, where their movement is more likely to be linear and purposeful, they are more likely to respect white lines. There are other reasons why pavement cycle tracks should generally be avoided, particularly in urban areas. But the likelihood that pedestrians will fail to respect them is not one of them.

We therefore suggest deleting the words “*but it is rarely respected*” to the end of the sentence, and replacing with:

“and may be an acceptable solution alongside faster and busier main roads where there is plenty of space and demand is light. However, where demand is likely to be greater, it is normally preferable to use a stepped track (see DE021 and DE022)”

DE024 Cycle Track Alongside Road, Shared With Pedestrians (relates to section 14.31)

In “*Key Design Features*”, bullet-point 4, we do not understand why “*cycle tracks should not deflect more than 45°*”. Surely what needs to be avoided is sharp corners (i.e. tight radii), rather than large angles?

Section 14.32: Cycle track crossing of side roads, and DE 025 and 026

This section needs to place stronger emphasis on the importance of drivers and cyclists being able to approach cycle track crossings of side-roads at right-angles to one another,

in order to maximise their ability to see one another. It is imperative to avoid forcing cyclists to turn their backs on the traffic shortly before crossing its path. If there is not space to bend out the cycle track to give it a perpendicular approach to the road crossing-point, it should not be bent out at all.

DE025 Cycle Track at Side Road with Cycle Priority

DE026 Cycle Track at Side Road, Cyclists Give Way

Under “Key Design Features” for both of these design elements, we suggest reversing and amending the last two bullet-points, as follows:

- *Where possible, cycle tracks should be ‘bent out’ away from the road well before the side-road crossing point, so that cyclists and pedestrians approach it perpendicularly to the side-road, so as maximise inter-visibility. Cyclists should not be made to turn their back to the road they are about to cross at the last moment, as this is difficult and dangerous, particularly for less experienced cyclists - see Visibility Dimensions for Cycle Routes (section 12.15).*
- *Cycle tracks should be bent out as smoothly as possible (i.e. maintaining a wide radius of curvature), with a normal maximum angle of deflection of 30° and an absolute maximum of 45°. If there is insufficient space to meet these criteria, the cycle track should not be bent out at all.*

Paragraph 14.34.1 and DE027 Cycle tracks in centre of carriageway

Two-way cycle tracks in the centre of the road are an interesting idea, but probably not suitable for roads with a lot of potential destinations along them (e.g. shopping streets). It is correct that “Access to and from the central track is critical”, however it should be noted that this access may be needed at many points along the route, not just at junctions along it – see also our comments on DE027 below.

DE027 Two-Way Cycle Tracks in Centre of Carriageway

Under “Measure and Brief Description”, after the words “access to the track”, we suggest adding “at both ends and at all points where cyclists may wish to join or leave the track.” Then add a full stop, and begin the next sentence with “This” instead of “which”.

Under “Other considerations”, add a second bullet-point saying:

“Difficulties in joining or leaving the track at points along it mean this arrangement is unlikely to be suitable for roads with many destinations along them (e.g. shopping streets) or with frequent side-road junctions, unless the traffic is light and/or very slow-moving.”

DE028 Bus Stop: Cycle Lane Bypass (relates to section 14.35 Cycle Lanes/Tracks at Bus Stops)

Under “Dimensions”, the dimensions a and c appear to have been reversed.

We suggest that 0.5m as an ‘absolute minimum’ width for dimension b is too low. In our view, this should be no less than 0.75m.

DE029 Bus Stop: Island Bus Stop (relates to section 14.35 Cycle Lanes/Tracks at Bus Stops)

In “Key Design Features”, bullet-point 5, the reference to a ‘minimum’ taper is confusing. It takes a moment to work out that this is about a ‘maximum’ angle, and that what is being ‘minimised’ is the ratio 1:10 to describe this angle. We therefore suggest rewording this bullet-point to say:

“Bypass entry / exist taper no sharper than 1:10.”

This wording should also be used on the diagram itself.

We also suggest showing a gap in the segregation strip shortly before the entry deflection point, and another one just after the exit deflection point – perhaps with two bollards between the start and end of these two gaps. This would allow cyclists the option to avoid the bus stop bypass, if this was obstructed and it was safer or preferable to use the road.

DE030 Bus Stop: Bus Stop Boarder (relates to section 14.35 Cycle Lanes/Tracks at Bus Stops)

Under “Other considerations”, add a bullet-point to say:

“This solution is only suitable for relatively lightly used bus stops. At more heavily used bus stops, it is likely to create conflict, particularly where cycle flows are also high.”

In the diagram for this design element, we suggest adding a ‘warning’ exclamation-mark road-sign for cyclists beside the up-ramp at the start of the bus boarder, with the legend: *“Give way to bus passengers”*.

DE031 Bus Stop: Shared Use (relates to section 14.35 Cycle Lanes/Tracks at Bus Stops)

Under “Other considerations”, add a bullet-point to say:

“This solution is only suitable for very lightly used bus stops. At more heavily used bus stops, it is likely to create conflict, particularly where cycle flows are also high.”

DE033 Cycle Track Away From Road, Shared With Pedestrians (relates to section 14.36, Cycle Tracks away from Roads)

Under “Other Considerations”, we suggest deleting the first two bullet-points. We cannot conceive of any situation where a cycle track away from a road would be a one-way track, hence there is no need for the first bullet-point. Nor are centre-line markings desirable if the track is shared with pedestrians (second bullet-point). In this situation, the design of the track needs to give cyclists the message that they have primary responsibility to respect pedestrians’ safety. Designing it like a ‘road for cyclists’ is therefore likely to increase (rather than reduce) conflict.

In the diagram for DE033, we suggest adding a “Share with Care” plate to the Diagram 956 sign, and marking a cycle roundel on the cycle track surface to alert both cyclists and pedestrians that cyclists are allowed to be there.

Paragraph 14.36.5

We suggest adding “Good lighting, surfacing, drainage and maintenance (including vegetation clearance and winter maintenance)” to the list of success factors for good traffic-free routes.

In relation to surfacing materials, it is also worth noting that good off-road surfacing materials made of recycled plastic now exist, which work well for both cyclists and equestrians, two groups whose surfacing needs were previously seen as incompatible. These recycled plastic materials are firm enough to provide good grip for cyclists’ tyres, while having a bit of springiness that provides comfort for horses. They are also durable and provide excellent drainage, making them good all-weather surfaces.

Paragraph 14.36.7

Whilst we agree that a separate unsealed surface may be preferable for equestrians, the need to provide one has been greatly reduced by the development of recycled plastic surfacing materials that meet the needs of both equestrians and cyclists – see previous comment.

Paragraph 14.37.1

In the light of the comments above, we are happy to recommend adding the words “*and horse-riding*” to the end of the bullet point about the need to consider “*surface dressings suitable for utility cycling*”

Paragraph 14.37.7

We suggest including a cross reference to section 12.12, figure 3-7 and table 3.3. for more information about the range of pedal cycle types that need to be accommodated.

Paragraph 14.38.7

At the end of this paragraph, replace “*reduced speed limits should be considered*” with “*speed limits should be reduced*”. Retaining a 60mph speed limit should not be seen as acceptable for active travel routes on rural single-carriageways without segregated cycle facilities.

Paragraph 14.39.1

We suggest adding at the end of this paragraph:

“It is preferable to continue the cycle lane with light segregation, even if only for a short section, not least because this prevents the exit-point from the cycle track from being blocked by parked vehicles.”

This should be restated in the “*Other Considerations*” section of DE034 (see below).

DE034 Transition Between Cycle Lane and Cycle Track (relates to section 14.39 Transitions between Cycle Tracks and the Carriageway)

In “Key Design Features”, bullet-point 3, after “any kerbs at 90 degrees.”, add “These should be flush.”

The “Other Considerations” are erroneously copied-and-pasted from DE033.

The corrected “Other Considerations” section will need to start with something along the following lines:

“Transitions between cycle tracks and the carriageway are only possible on cycle tracks intended for one-way use”.

As noted above, the “Other Considerations” section should also include a bullet-point saying:

“It is be preferable to continue the cycle lane with light segregation, even if only for a short section, not least because this prevents the exit-point from the cycle track from being blocked by parked vehicles.”

Paragraph 14.40.2 and DE035

This paragraph needs to say that cyclists should be permitted to use all bus lanes, including contraflow lanes.

After the words “subject to appropriate lane widths”, add “as shown in DE035”.

Delete the words “and form a large proportion ... child cyclists are anticipated”. These additional caveats about where it is “preferable to separate cyclists from buses” are unnecessary – it is preferable to separate cycles and buses wherever bus flows are high. The idea that this is affected by who is using the route merely panders to the ‘dual networks’ idea (an idea that is rightly rejected in paragraph 12.14.2), namely that it is acceptable to provide different routes for children and other less experienced cyclists. Active travel routes should meet the needs of all cycle users.

DE035 Bus Lane

Under “Dimensions”, after the second sentence (ending “3.2m”), add the following:

“However this should only be used for short lengths, to avoid causing stress to cyclists (particularly less confident cyclists) due to buses wishing to overtake from behind.”

Paragraph 14.41.1

In the third sentence, after the first word (“Taxis”), add “and other vehicles (e.g. motorcycles, goods vehicles)”, as these vehicle-types are also permitted to use some bus lanes. However the paragraph should then conclude with an additional sentence: “This should be avoided.”

Paragraph 14.41.2

At the end of the final bullet-point, replace “*traffic danger*” with “*source of danger that may appear suddenly (e.g. road surface defects, drivers changing lane or pedestrians walking into the road unexpectedly).*”

Paragraph 14.43.1

It would be worth mentioning that “*Around three quarters of cyclists’ injuries occur at or near junctions*”.

Paragraph 14.3.6

In the third bullet point, add “*motor vehicle*” before “*speeds*”, to avoid ambiguity.

Paragraph 14.43.17

Add the following words at the end of the first bullet-point:

“Flush kerbs are especially important for users of pedal cycles and wheelchairs.”

Paragraph 14.44.3

Add a reference in this paragraph to cycle detection loops on the approaches to signalised cycle crossing points. One way to minimise (not “mimize”) delays for cyclists is not to make them stop and push buttons at these locations. The Dutch avoid doing this, we should do likewise.

Paragraph 14.45.4 and 14.45.5

The references to LTN 1/95 and 2/95 can presumably now be updated.

Section 14.46: Uncontrolled crossings, and DE036, DE037, DE038, DE039 and DE040

We suggest incorporating sections 14.52 and 14.53 into this section. It seems odd to discuss uncontrolled crossings in paragraph 14.46.5, only to return to the subject four pages later.

We wish to particularly commend design element DE040: this is an excellent solution.

Paragraph 14.46.5

After the words “on wider roads”, delete “and when traffic flow is high”. An uncontrolled refuge is a wholly inadequate pedestrian crossing point on roads with high traffic flows. It would be even more unacceptable on less wide roads, where refuges are also likely to cause pinch-points for cyclists (see section 12.23). They should only be used on wide roads with light traffic flows but where pedestrian demand is insufficient to justify a controlled crossing.

Section 14.47: Median strips and DE041

Median strips undermine the opportunity to provide cycle lanes. On roads where there is a need to assist pedestrians to cross, there are invariably better ways to achieve this.

DE041 Central Median Strip

After the “Benefits” section, add a Disbenefits section, with the following bullet-point:

- *“Loss of space that might otherwise be used for cycle lanes or tracks.”*

DE042 Zebra Crossing (relates to section 14.48 Zebra Crossings)

In “Key Design Features”, the penultimate bullet-point (starting “Zig-zag markings...”) should be moved to be dimension c under the “Dimensions” heading. This should be marked accordingly on the accompanying diagram.

Section 14.49 Signalised crossings away from junctions, DE044 and DE045 *Section 14.55*

As noted in this paragraph, the idea behind Puffin crossings was to replace the signals for crossing pedestrians (and, in the case of some toucans, for cyclists) on the far side of the crossing, with an indicator above the push-button, on the assumption that this would make users look in the direction of the traffic rather than relying on the signal. This idea was entirely misguided, with good evidence that this merely confuses users, rather than improving safety. We therefore urge that the guidance sets out a clear preference for Ped-X crossings and for toucan crossings with far-side crossing signals.

We also suggest incorporating section 14.55 into section 14.49, with paragraph 14.55.1 going at the start of the section, and paragraph 14.55.2 being merged with 14.49.3.

DE044 Puffin and Ped-X Crossings

In “Key Design Features”, at the end of the first bullet-point (which describes Ped-X crossings), add the words:

“They should be used in preference to Puffin crossings”.

DE045 Toucan Crossing

Delete “preferred by some users and are more suited to”, and replace with “preferable to those with nearside signals only, particularly at”

Paragraph 14.50.4

To make it clearer that staggered crossings should now be avoided, we suggest amending the first part of the second sentence, to say:

“In the past, such crossings have often been staggered, with pedestrians having to cross each carriageway separately,”

Paragraph 14.51

Replace “preferably” with “normally”.

Sections 14.52 and 14.53, plus DE036 and 038

As noted above, we recommend incorporating these paragraphs into section 14.46.

Section 14.55 Signalised Cycle and Pedestrian Crossings (Toucan)

As noted previously, we suggest merging this section into section 14.49, with paragraph 14.55.1 going at the start of that section, and paragraph 14.55.2 being merged with 14.49.3.

Paragraph 14.56.2

At the end of this paragraph, add the words “, or provide a cantilevered structure”. This is sometimes another option for providing a pedestrian / cycle bridge using an existing structure where the latter is not wide enough to accommodate the separate pedestrian or cycle facilities that are needed.

DE046 Pedestrian/Cycle Bridge (relates to section 14.56 Pedestrian and Cycle Bridges)

At the end of “Measure and brief description”, add the following sentence:

“However pedestrian/cycle bridges over roads require a greater height difference than tunnels, because motor vehicles require more headroom.”

We suggest deleting the last bullet-point of “Benefits”. Bridges only provide better personal security than tunnels where the tunnel is narrow, poorly lit and/or has blind corners. It would be better to make this point as a disadvantage of some tunnels, rather than suggesting that it is invariably an advantage of bridges – see comment on DE047.

Section 14.57 Subways and Underbridges, and DE047

This section should include point that, although pedestrians and cyclists generally prefer bridges to underpasses that are narrow, dark and with blind corners, it is also possible to design underpasses that are straight, wide and with good light visibility from one side of the underpass to the other, thereby eliminating the actual and perceived risks of underpasses. Where this is done, underpasses also have the advantage that pedestrians and cyclists require less headroom than motor-vehicles. Hence there is less of a need for gradients to achieve the required height separation when constructing a pedestrian or cycle underpass, rather than an overbridge.

DE047 Subway/Underpass

Under “Benefits”, add:

- *Needs less of a height difference than for pedestrian/cycle bridges (as pedestrians and cyclists need less headroom than motor vehicles), hence less need for gradients.*

Add a “Disbenefits” section: saying:

- *Tunnels which are narrow, poorly lit or with blind corners provide poor personal security.*

Section 14.58 Wheeling ramps, and DE048

The following point should be made:

“Care should be taken in positioning the wheeling ramp. The ramp should be far enough away from the side-wall to allow cyclists to use it without the side-wall snagging their handlebars (including cycles with wide handlebars), but not so far out as to impede less-able pedestrians from using the hand-rail. In practice, the wheeling ramp should normally be directly below the hand-rail, with enough height difference between them for a bicycle, angled slightly outwards, to fit beneath the hand-rail.”

DE048 Wheeling Ramp

Under “Dimensions”, add a further bullet-point:

- Handrail should be above wheeling ramp, with the centre of both being 200m from the wall

In the accompanying diagrams, the top left diagram (view from above) should show the centre of the handrail being above the centre of the wheeling ramp.

Section 14.60 and DE049

This section is incorrectly marked as being associated with design element DE048. It should be DE049.

Paragraph 14.60.1

Another good example of a junction without priority markings is this one, near the Barbican in London, and the next junctions immediately to the north and west of this one:

<https://www.google.com/maps/@51.5195759,-0.0901492,3a,75y,212.74h,65.23t/data=!3m6!1e1!3m4!1s7Eeia5SPQjt7yiTU2dZrFQ!2e0!7i16384!8i8192>.

Paragraph 14.61.2

Insert “motor” between “left turning” and “vehicles”.

Paragraph 14.62.9

The statement that “Low level signals are easier for cyclists to see when at a stop line” is only true provided there are not too many cyclists waiting at the stop line. When there are several cyclists waiting at the lights, those to the right of the group cannot see the low-level signal on the left hand side of the road, because their view of it is obstructed by

other cyclists. It is therefore important also to provide a far-side repeater at any junction with significant cycle flows.

Paragraph 14.62.1

At the end of this paragraph, add the following:

“However, where a junction is approached by segregated cycle facilities, alternative junction designs are preferable. As unsegregated cycle lanes are upgraded to protected cycle lanes, ASLs should also be progressively replaced with junctions of the kind shown in Section X.”

‘Section X’ is a section which needs to be added, showing junction designs such as ‘cyclops’ junctions – see <https://tinyurl.com/y5oacpj6>. We suggest it should be placed after the existing Section 14.68.

DE050 Advanced Stop Line

At the end of the “Measure and Brief Description” paragraph, add:

“As unsegregated lanes on the approach to these junctions are upgraded to protected cycle lanes, ASLs should be progressively replaced by designs such as Cyclops junctions, see section X.”

In the “Key Design Features” section, in the first bullet point, after “coloured surfacing”, replace the word “can” with “should”.

In the second diagram accompanying DE050, the white line which splits the ASL into two sections is presumably an error.

DE061 Cycle Bypass at Traffic Signals (relates to section 14.68)

In the diagram for this design detail, it is unclear why there is hatching at the bottom right of the diagram. We suspect this should be removed.

Section 14.74 Trixi Mirrors (Blind spot mirrors)

Trixi-mirrors are intended to address a very serious problem, namely the lethal risks posed to cyclists by left-turning lorries. They are an inexpensive solution which may help lorry drivers to spot cyclists on their near-side before the lorry drivers starts moving, However they cannot help after the lorry has started moving and then turning, as the driver will by then have passed the mirror. We have seen no evidence of their effectiveness, and are doubtful of their value, despite them being inexpensive.

Paragraph 14.76.3

Roundabouts with dedicated left turn slip roads are dangerous to cyclists in all circumstances. The final sentence of this paragraph should therefore be shortened to simply say: “They should be avoided”

Paragraph 14.76.4

Amend this to say, “Three ways” (rather than “Two ways”), then add a third bullet-point on how to provide cycling infrastructure at roundabouts:

- *“Provide cycle facilities through the centre of the roundabout. This is often possible where there are subways, however it can also be done using surface crossings, particularly where there is a dominant cycle flow that can be given favourable signal timings”.*

There is an excellent example in Leicester – see <https://tinyurl.com/y9wd2fyo>.

Section 14.80 Dutch Style Roundabout and DE58

[Note incidentally that there is a numbering inconsistency, which is also apparent in design elements DE 053, DE 54 and DE 55. The other design elements all contain a zero, and have no gap between the DE and the following number].

The text for both this section and the corresponding design diagram DE58 (presumably this should be DE058) should say:

“This junction design is suitable for 30mph junctions where the incoming roads are one lane wide before the approach to the junction. In these circumstances, it is a safer option than traffic lights.”

Figure 5.47

We regret being unable to comment on this diagram, as it is unreadable.

Chapter 15: Integration with Public Transport

General

Cycling UK has proposed to Transport for Wales (TfW) that its programme for promoting cycle-rail integration should be informed by an analysis, using the Propensity to Cycle Tool (PCT), of the stations in Wales with the greatest potential for increased cycle use to access them. We understand that discussions are underway between TfW and the PCT team. We hope that the analysis is conducted and that good use will be made of the results. These should in turn should be fed into the Active Travel Network Map process.

Chapter 16: Street Furniture and Cycle Parking

Paragraph 16.8.6

The London Cycling Design Standards proposes a useful principle for determining when more cycle parking is needed, namely that this should be done when the available cycle parking is regularly 80% filled. We propose the adoption of this rule, and hence that the words “close to” should be deleted and replaced by “regularly at 80% of”.

*Paragraph 16.8.7 and
Table 7-2*

This paragraph and table need to spell out the importance of making provision for parking the range of non-standard pedal cycles, notably those used by people with disabilities.

Virtually all non-standard cycles can use a lengthened variant of the ‘Sheffield’ cycle parking stand if it also has a second cross-bar at half the height of the top one (see left hand photo). However, simply providing a half-height stand prevents it being used by standard pedal cycles. If the former solution is chosen, it should be clearly signed as being for disabled cyclists, with plenty of standard cycle parking being provided nearby.



For more advice, see the ‘Guide to Inclusive Cycling’ published by Wheels for Wellbeing, from which the above photos are taken: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/12/FINAL-v3.pdf>.

[Photo credits: Cyclehoop (left) and Kevin Hickman (right)].

In table 7-2, in the annotation for the ‘Vertical Stand’ cycle parking, after the words “requires user to lift cycle”, add, “May be difficult or impossible for cyclists who are disabled, short or lacking upper body strength.”

Paragraph 16.9.8

We propose the deletion of the sentence “Overuse of coloured surfacing adds to this.” The roads where coloured surfacing is needed will normally be relatively busy roads, where the visual intrusion from motor traffic itself is far more problematic than the visual intrusion created by some coloured surfacing intended to deter motor vehicles from intruding on to cycle lanes – see previous comment on paragraph 14.3.4.

Paragraphs 16.9.16 and 16.9.17

We suggest adding the point that direction signing should give cycling journey times to destinations (i.e. in minutes) rather than distances (in miles). Although cyclists vary in their travel speeds, the advantage of giving journey times is that they raise awareness among non-cyclists of the surprising distances that can be covered by cycle in relatively short amounts of time, even at very moderate speeds. The adoption of journey time signing in London has proved to be highly effective at persuading people to take up cycling.

Chapter 17: Related Facilities

Paragraph 17.1.6

Insert the words “at least” before “the same importance”.

Paragraph 17.3.6

Insert the words “designed to a standard that is” before “appropriate”.

Paragraph 17.6.1

At the end of this paragraph, add the following sentence:

“Highway authorities should therefore systematically look for synergies between their programmes for cycling and walking improvements and for planned highway maintenance, identifying opportunities to deliver cycling and walking improvements when carrying out planned highway maintenance works.”

Paragraph 17.6.2

At the end of this paragraph, add the following sentence:

“Coloured surfacing for cycle facilities can also be introduced during planned resurfacing works, particularly at junctions and other potential conflict points.”

Table 9-4

As elsewhere in the document, the terms “preferred”, “desirable maximum” and “absolute maximum” need to be defined, including clarification of which of these terms amounts to ‘standards’ under section 3(6)(b) of the Active Travel Act.

Paragraph 18.12.2

After the words “any form of access control,” delete the words from “as these” to the end of the sentence (“intended to address”) and replace with:

“installing these only in response to evidence of actual problems of abuse of cycle and pedestrian facilities, and never simply in response to perceived problems.”

At the end of the first bullet-point, add another sentence saying:

“These include people with disabilities and other users of non-standard pedal cycles, e.g. families with cycle trailers. Impeding access for these groups may amount to a breach of the Equality Act.”

Section 18.14

This section needs to refer to the option of solar powered or LED lighting mounted in the surface of off-road cycle and/or pedestrian routes, as solutions which minimise both

energy consumption and visual intrusion where this is a sensitive issue. We suggest including a reference to this following paragraph 18.14.4.

Paragraph 18.15.2

We suggest expanding this into a full bullet-point summary list of ways in which highway authorities should take account of the needs of pedestrians and cyclists in fulfilling their highway maintenance responsibilities. The following suggestion for this paragraph sets out the relevant issues in relation to cycling – there may be additional points that should be made in relation to walking:

“The safety of pedestrians and cyclists is disproportionately affected by poor highway maintenance. Maintenance-related damages claims made by cyclists are on average 13 times higher than those made by drivers, as they are much more likely to involve personal injury. Cuts to maintenance spending on local roads (where walking and cycling activity is concentrated) have a disproportionate economic disbenefit: a £1 cut to local road maintenance spending has an economic cost of £1.67, compared with just £1.12 for maintenance spending on trunk roads. Highway authorities’ maintenance policies and procedures should therefore prioritise pedestrian and cycle safety in the following ways:

- *Giving greater priority to local roads, and particularly to designated active travel routes, in their inspection frequencies and intervention standards, as well as their policies and procedures for vegetation clearance, winter maintenance (see section 18.20) and lighting maintenance (see section 18.14).*
- *Giving priority to the types of defects listed in paragraph 18.18.2 when determining the urgency of carrying out repairs, given the disproportionate risk these pose to active travel users.*
- *Integrating their active travel improvement programmes with their programmes for planned highway maintenance works, seeking systematically to identify opportunities to improve cycling and walking conditions when carrying out carriageway resurfacing (see paragraph 17.6.2).*
- *Constructing footways, cycle tracks and other off-road active travel routes to standards which minimise maintenance needs.*
- *Ensuring they have the equipment needed to carry out vegetation and winter maintenance of footways, cycle tracks and other off-road active travel routes.*
- *Reflecting cycle and pedestrian safety in their management of road repairs and other street works (see chapter 19)*
- *Ensuring that signing, road markings and coloured surfacing relating to active travel is well maintained and properly reinstated following road repairs and utility works.*

Paragraph 18.18.2

The list of defects that particularly affect walking and cycling serviceability should also include the following:

- Under “Carriageway, footway and cycleway surface defects”, add:
 - *“Defects which run parallel to (rather than across) a cyclists’ line of travel (i.e. those which are more likely to trap a cyclists’ tyres);*

- *“Defects which are close to junctions, given that cyclists need to pay greater attention at junctions to other road users (rather than watching the road surface), and to be cornering (putting them more at risk of being thrown off balance);*
- *“Defects with a vertical or near-vertical surface where the wheel has to come out of the pothole;*
- *Defects on gradients, where cyclists’ speeds are likely to be greater.”*
- Under *“Signing, road studs and markings”*, add:
 - *“Failures to reinstate signing, markings or coloured surfacing denoting active travel facilities”.*

Additionally, the last bullet-point of *“Carriageway, footway and cycleway surface defects”* should be amended, replacing the words *“the first 2m or so from the kerb”* with *“the 2m nearest the kerb or to any parked cars (if normally present)”*.

Chapter 19: Cycle and Pedestrian Traffic at Streetworks and Construction Sites

Paragraph 19.1.2

This paragraph claims that:

“Section 9 of the Active Travel Act requires that roadworks should provide suitable provision for pedestrians, including disabled people, and cyclists without cyclists needing to dismount.”

Unfortunately this is not the case. This paragraph would be more accurate if it said:

“Section 9 of the Active Travel Act requires highway authorities (including Welsh Ministers) to “have regard to the needs of walkers and cyclists” in their management of street works. The aim should always be to make suitable provision for pedestrians including disabled people, and for cyclists without requiring them to dismount.”

Paragraph 19.2.1

The list of hazards relating to temporary traffic management should also include:

- *“Temporary traffic lights to control alternate one-way traffic flows, where these do not allow sufficient time for cyclists to get through the one-way section before oncoming traffic starts moving towards them (see point 5 of paragraph 19.3.1)”*

Chapter 20: Monitoring and Evaluation

Paragraph 20.2.1

The list of reasons given for the importance of monitoring and evaluation is worded in ways that lean too far towards proving that active travel schemes demonstrate good value for money, rather than being open-minded to the possibility that some experiments

may not work and learning from well-intentioned but unsuccessful schemes. In particular, we suggest rewording the third bullet-point, to say:

- *“demonstrate whether schemes represent value for money, in order to shape future spending decisions and prioritisation”*

We also suggest a bullet-point about the need for monitoring to

- *“demonstrate whether schemes are contributing to the wider aim of achieving mode shift towards cycling and walking”*

Paragraph 20.3.2 and Table 11-1

If the guidance is to recommend monitoring both ‘outcomes’ and ‘impacts’ of schemes, it needs to explain the difference. The examples given of ‘impacts’ are *“Reduction in incidence of accidents, congestion reduction”*. However we would understand these as ‘outcomes’. The distinction either needs to be clarified or dropped.

Glossary

Terms which we believe should be added to the glossary include:

- ‘Basic network’ (see paragraph 5.1.3 and section 14.4)
- ‘Mesh density’ (see paragraph 5.6.4)
- ‘Strategic case’ (see paragraph 2.7.2)

The glossary would also be an appropriate place to provide terms such as ‘desirable’ and ‘absolute’ maximum and minimum standards (and any other terms relating to standards that are to be used in the final version), explaining which of them are ‘standards’ for the purpose of section 3(6)(b) of the Active Travel Act.

Appendix L

In the final table, delete *“National”* before *“Propensity to Cycle Tool”*.

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: