

**Date:** 20 March 2025

## **Consultation Response: Update to Active Travel Act Guidance (ATAG)**

**To:** Transport Equity and Active Travel Division, Welsh Government **From:** Transport Action Network (TAN) Cymru **Date:** March 2025 **Subject:** Response to the Consultation on Active Travel Act Guidance and Delivery Plan

TAN Cymru welcomes this opportunity to respond to this consultation on Active Travel Act Guidance and Delivery Plan.

We believe that there is an urgent need to realign Welsh infrastructure spending with the climate emergency and the goals of the Well-being of Future Generations (Wales) Act 2015.

In welcoming the 2025 update to the Active Travel Act Guidance (ATAG), we believe that the current delivery model is too fragmented.

In order to achieve the Welsh Government's sustainable travel target of 45% by 2040, we firmly believe that we need to move from a "grant-bidding" culture to a "network-mandate" culture, where creating interconnected, safe walking, wheeling, and cycling routes (networks) to shift public behavior towards human-powered transport, should be the preferred choice, not just an option, through infrastructure investment and planning.

Work by the Chartered Institution of Highways and Transportation (CIHT).<sup>(1)</sup> highlights that every £1 invested in active travel delivers a return of roughly £5.62 in health and economic benefits, a significantly higher return than traditional road-building projects.

---

### **2. Technical Design and Inclusion**

The updated ATAG must be the definitive "rulebook" for high-quality infrastructure. We support the following enhancements:

- **Inclusive Design for Women and Girls:** In light of recent evidence,<sup>(2)</sup> the ATAG must mandate "Social Safety" in design. This includes high-quality lighting, clear sightlines, and natural surveillance on all routes to address the disproportionate barriers women face in using active travel networks.

- **Ending the "Shared-Use" Default:** Shared-use paths are often a "compromise of failure." In urban environments, the ATAG should mandate physical segregation between pedestrians and cyclists. Where space is constrained, the guidance must advocate for **reallocating carriageway space** rather than forcing cyclists onto pavements.
- **The "Wheeling" Standard:** We support the explicit inclusion of "Wheeling" to cover wheelchairs, mobility scooters and those with prams. Design standards must ensure that all crossings are flush and all "Active Travel" routes meet a minimum effective width of 2.5m (3m-4m for higher flow areas) to accommodate adapted cycles.
- **The Sustainable Transport Hierarchy:** The guidance must legally require planners to prove they have exhausted all options for pedestrians and cyclists before considering private motor vehicle flow.

---

### 3. Strategic Policy Asks

#### A. Financial Accountability

The recent consolidation of funding into the "Regional and Active Travel Fund" risks diluting the focus on walking and cycling.

- **Our Ask:** Reintroduction of a ringfenced Active Travel fund, to prevent the dilution of funds into regional pots.
- **Our Ask:** We propose a "Climate Stress Test" for all transport spending, ensuring that for every £1 spent on road maintenance, at least £2 is spent on active travel enhancements.
- **Our Ask** Move to multi year funding models for local authorities to allow for a more strategic approach to planning cohesive networks, rather than the current piecemeal approach

#### B. Rural Connectivity and the "Hub-and-Spoke" Model

Active travel is not just for cities. We support Cycling UK's call for a focus on rural car-dependency.

- **Our Ask:** Implement a "**Hub-and-Spoke**" model for rural Wales, connecting smaller villages to market towns via "Quiet Lanes," Greenways, and segregated paths.
- **Our Ask:** Broaden the definition of "Active Travel Settlements" to include smaller rural service centres currently excluded from funding eligibility.

#### C. Integration with Public Transport

Active travel is the "first and last mile" of every sustainable journey.

- **Our Ask:** Ensure all new rail and bus rolling stock features **sufficient space for cycles** as a mandatory requirement.
- **Our Ask:** Every major transport interchange must be upgraded to a "Mobility Hub" featuring secure, weather-proof, and high-capacity cycle storage.

### **C. Maintenance as an Active Travel Duty**

- **Our Ask:** The Welsh Government must issue a "Direction" to Local Authorities stating that any resurfacing of an "Active Travel Route" must include an audit of how that route can be improved (e.g., widening or lighting) rather than just replaced *like-for-like*.

---

### **4. Conclusion**

Wales was an innovator in legislating for active travel, but delivery has slowed. This consultation is a pivotal moment.

We have the legislation (the 2013 Act) and the strategy (**Llwybr Newydd**), but we lack the consistent high-quality delivery. TAN Cymru calls on the Welsh Government to be "brave on the road space" and "rigorous on the standards."

Active travel is not a leisure activity; it is a fundamental tool for decarbonisation, public health, and social equity.

Yours sincerely,

Rhian Nowell-Phillips (Ms)

**Welsh roads and climate campaigner**

**TAN Cymru**

---

---

---

#### **1. Overcoming the barriers to implementing active travel schemes'**

2. [Identifying Barriers and Facilitators to Active Travel Infrastructure Usage Amongst Under-Represented Population Groups in the United Kingdom: A Rapid Systematic Review](#)

---