

Enterprise and Business Committee  
Active Travel (Wales) Bill  
AT 23 YHA Cymru Wales

25/03/13  
To the Enterprise and Business Committee

61, Chantal Avenue,  
Penyfai  
Bridgend  
CF31 4NW

Dear Sir

I submit on behalf of YHA Cymru Wales a written response to your questions on the Active Travel Bill. Please can you confirm receipt.

Rowland Pittard  
Vice President Wales



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## **Written evidence to Enterprise & Business Committee on Active Travel (Wales) Bill**

**Is there a need for a Bill aimed at enabling more people to walk and cycle and generally travel by non-motorised transport? Please explain your answer.**

YHA supports the need for a bill to ensure that adequate resources are made available to maintain and develop the provision for walking and cycling. It is essential that provision for recreational walking and cycling is made throughout Wales to further encourage tourism and the development of the Welsh economy.

YHA is concerned about the lack of clarity between funding for footpaths and funding for cycle ways which at present come from different budgets in most local authorities. We are also concerned that when new roads and motorways are provided that they frequently do not provide for walkers and cyclists and in some cases have lead to footpath closures. We can provide examples of road developments that have made no provision for walkers although they are the most direct links between communities and also to shops, railway stations and other facilities. We believe a duty to develop and maintain the provision for walking and cycling is important for Local Authorities in Wales.

The development and improvement of paths especially for walkers and their subsequent maintenance must not be deterred by a lack of funding. However we have also seen the development of token cycling routes including sections a few metres in extent with associated signage. This is a result of walking and cycling not being taken seriously by Local Authorities. This is a waste of public money and could have been better spent on footpath developments for people that have no choice but to walk. New routes must have a purpose and must provide continuity. We support strongly the need for recreational routes for health and well being and tourism opportunities as well as functional routes linking communities with transport facilities and town and village centres.

We firmly believe that all routes should be provided and maintained for walkers and cyclists. We note some cases the provision of more circuitous unlit routes for cyclists whereas more direct well lit routes could be provided adjacent to a public highway.

**What are your views on the key provisions in the Bill, namely –  
the requirement on local authorities to prepare and publish maps identifying current and potential future routes for the use of pedestrians and cyclists (known as “existing routes maps” and “integrated network maps”) (sections 3 to 5);**

We support the requirement but there must be a robust method of consultation with potential users with regard to potential new routes. This will prevent the provision of unsuitable routes and blocking up of footpaths for road schemes. The decisions on the provision of new routes must not just rest with Local Authorities and Transport Consortia but must also involve local access fora. The preparing and publishing maps will play an important role in identifying what exists and also where there are gaps in the provision. There must be continuity across Local Authority boundaries.

Local authorities take into account the need to raise awareness of existing and new walking and cycling routes. This includes local inhabitants and potential visitors. Walking and cycling times as well as distances on signage will help encourage use of these paths as opposed to using a car.

**the requirement on local authorities to have regard to integrated network maps in the local transport planning process (section 6);**

We consider that not only should local transport consortia be involved but other stakeholders should be actively consulted including Health and Well being, Tourism, disadvantaged groups and local communities to ensure that value for money schemes are provided. Not all people own or can afford to own a bicycle while others are unable for various reasons use a bicycle so in all cases priority should be given to developing footpaths especially for community use. It is important that all footpaths and bridleways are shown on the integrated network maps.

Integrated network maps should play a crucial role in informing future local and regional transport planning, highlighting key areas where improvements and additions to footpaths and cycle paths could lead to an increase in regular journeys and recreational walking.

The Bill requires local authorities to take into account ‘the location, nature and condition’ of a route ( but not potential use) when determining the most appropriate route. YHA believes the criteria should be widened to create routes that are “continuous, direct, safe and comfortable for walking and cycling”.

**the requirement on local authorities to continuously improve routes and facilities for pedestrians and cyclists (section 7);**

Continuous improvement will be vital in ensuring that an increasing number of people living in Wales are able to benefit from safe walking and cycling routes. We are not clear as to the term ‘continuously improve’ which could only involve the improvement of existing route. We would like to see a progressive programme of route development especially in those areas where there is an identified need either for recreational purposes or functional use .This could be associated with new public transport developments such as new railway stations, new housing developments ,new retail and industrial developments. Additional funding could be provided as part of these new developments.

Where footpaths and cycle ways cross roads there should be adequate safety precautions in place. YHA has experienced difficulties with new road schemes at Brecon and Lledre Valley and had to close a hostel at Penmaenmawr when the new expressway was built. However there must not be a presumption against routes in upland areas including those used by mountain bikers. YHA has always supported the high level route Cambrian Way in Wales and would still like to see it developed as a unique route with a substantial benefit to the economy of Wales.

**the requirement on highway authorities to consider the needs of pedestrians and cyclists when creating and improving new roads (section 8)**

Too many new roads have been or are being without facilities for pedestrians or cyclists although they form direct route and are often well lit. We support this requirement but also consider that there should be retrospective improvements to provide walking and cycling facilities in some of those cases where earlier road schemes do not have those facilities. We can provide examples of direct routes linking communities to railway stations and out of town retail parks which have no provision for walkers/ pedestrians.

YHA would like to see a re-appraisal of the WelTag system, which is biased towards road transport, and not to walking and cycling and also to rail and light rail transport. We cannot understand why road schemes with a low BCR are given priority over other transport schemes with a much higher BCR. WelTAG disadvantages schemes that promote physical activity including recreational walking

and cycling although improved health and well-being can be included as a benefit. The provision for tourism and its economic benefits should not be underestimated especially the all Wales Coastal path and associated link paths which are still to be developed.

Paths away from roads sometimes but not always attract more users than those placed directly next to the road, therefore when constructing new road schemes consideration should be given, where possible, to providing attractive safe and well lit but not circuitous routes away from traffic.

**3. Have the provisions of the Bill taken account of any response you made to the Welsh Government's consultation on its White Paper? Please explain your answer.**

YHA provided a response to the consultation on the White Paper but was not invited to the Conference in Cardiff at the Pierhead in June 2012. We consider that the selection procedure for the conference was not adequate and did not reflect the needs of younger people. It focused strongly on the cycling community and not on recreational walking which has considerable tourism benefits especially for young people and families and visitors to Wales.

We consider that the bill appears to be focussing on cycling and not walking whereas the latter is more important as it is the only means of travel for some people in areas lacking adequate public transport. We consider that the focus also appears to be on urban city regions and not on smaller towns and rural communities. Access to the nearest town and railway station for a community with no or sparse public transport must be more important than developing cycle ways in urban areas which have adequate public transport. We do not support the concept of a threshold of 2,000. A Youth Hostel with a resident population of one person could generate more walking and cycling requirements than a village of 2,000.

YHA is awaiting the publication of guidance to see what level of engagement with potential users including young people will be recommended.

**To what extent are the key provisions the most appropriate way of delivering the aim of the Bill?**

There is a need for a clearer aim and also a time scale for achieving the aim. We are concerned that the W.G.Walking and Cycling Strategy had a large number of aims but what was the end result? We understand that it is being further revised!

It is important that the new provisions should be located where there has been an established need and not on a like to have basis. Priority must be given to walking over cycling and the need of rural communities must not be ignored. The Smarter Choices programme has never been fully exploited .

The Bill also makes no provision for monitoring and analysing the interventions made in delivering the improved network and the integrated network map. The majority of routes delivered through Regional Transport Plans or the Safe Routes programme do not include scheme specific monitoring and as a result many local authorities in Wales have a lack of baseline data on walking and cycling. There must be more active measuring of use age of paths and cycle ways . It is likely that sections of

the Coastal Path could produce some of the highest use age statics thus highlighting the need for better link paths to the Coast

The Bill and accompanying documents make no reference to Compulsory Purchase Order (CPO) powers. We note the provision of a section of the Coastal Path on land owned by TATA steel at Port Talbot but this has not been opened because of the lack of a compulsory purchase order and an unwillingness by TATA to sign an agreement to dedicate the land. There is also the need to remove orders which forbid pedestrians from using certain sections of road where adequate footpaths could be provided on existing verges.

**What are the potential barriers to the implementation of the key provisions and does the Bill take account of them?**

The main barriers to delivering the key provisions outlined in the Bill will be availability of funding, the skill-set and capacity in local authority transport departments, including the willingness to move away from traditional highways engineering, and the use of WelTag to identify the costs and benefits of different transport projects. Local authority transport departments are largely staffed by experienced highways engineers with limited knowledge of best practice designs and desirability for providing facilities for walking and cycling and also for providing access to public transport. There are numerous locations in Wales where barriers have been erected forcing pedestrians to use more circuitous routes and not the direct route available.

**What are your views on the financial implications of the Bill (this could be for your organisation, or more generally)? In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Impact Assessment), which estimates the costs and benefits of implementation of the Bill.**

The Welsh Government does not expect local authorities to spend any additional funds in the delivery of the Active Travel (Wales) Bill. However funding will be required to produce and update the maps and it is not clear how this will be achieved. This should not be taken from existing footpath rights of way budgets.

**To what extent has the correct balance been achieved between the level of detail provided on the face of the Bill and that which will be contained in guidance given by the Welsh Ministers?**

We have not seen the guidance and consequently it is difficult to comment. There will be need for robust substantial guidance to ensure that implementation is consistent across Wales. It needs to be strong to be effective. It will have to take into account -What is a suitable route? How to prepare, consult on and publish the existing route map .How to prepare, consult on and publish the integrated network map, What will qualify as 'continuous improvement' How disabled, older persons and children users considered, How to take into account rural communities and their proximity essential facilities and links to public transport .

**Are there any other comments you wish to make on the Bill that have not been covered in your response?**

We note the need for 3 years for the production of the maps and anticipate that this will include consultation within the first year .This timescales raises the question of use of resources which become available in year one .

We see no reference to sustainable development in the Bill and question if this will be included in the Guidance.

The Bill also presents issues relating to the status of Rights of Way, where official clarification could be helpful. There must be no loss of status for public Rights of Way and all existing routes designated under the Cycle Tracks Act 1984 should become Rights of Way. There will be problems if Permissive Rights of Way are shown on the maps especially where these could be for a limited duration e.g. under European agricultural schemes. However some of these routes are owned by Network rail and give access to Railway stations and others are at harbours giving access to ferries. Clarification is needed.

We consider that cycle ways should always be available to walkers / pedestrians. The segregation on some roadside pavements is unworkable especially where pedestrians have to walk in single file to allow space for nonexistent cyclists. Evidence shows incidents of conflict on shared use paths are extremely low and the benefits of routes which allow families – including older people and those with disabilities – to undertake activities together are substantial. There should be a code of conduct for users of shared paths.

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