

Active Travel Bill (Wales)
Response of the three National Park Authorities of Wales
March 2013

Consultation questions

- 1. 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.**

The information provided in the Regulatory Impact Assessment would appear to confirm the need for a Bill in order to achieve a modal shift to cycling and walking for shorter journeys. It is arguable, however, that most of the objectives of the Bill could be achieved without the need to legislate. The case for legislation would be stronger if for example if there was a clear duty to implement the Integrated Network Maps, although it is accepted that this would have resource implications for the local authorities.

- 2. 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);** The preparation of maps should entail a wide consultation with stakeholders and target communities in order to promote an awareness of existing provision and fully engage the public in future development. The provisions in the Bill for the publication of maps (section 5) are essential in order to achieve the aim of establishing a walking and cycling culture.
 - **the requirement on local authorities to have regard to integrated network maps in the local transport planning process (section 6)** This provision is necessary in order to embed the needs of active travel in the transport planning process and is to be welcomed.
 - **the requirement on highway authorities to consider the needs of pedestrians and cyclists when creating and improving new roads (section 8).** Again this requirement is welcomed as it has proved to be more expensive to retro fit cycle lanes following road improvements. It is appropriate to consider the needs of all non-motorised road traffic when planning road improvements.
- 3. Have the provisions of the Bill taken account of any response you made to the Welsh Governments consultation on its White Paper? Please explain your answer.** Generally the Bill has taken account of the representations of the three National Park Authorities. National Park Authorities expressed concerns with regard to the proposed changes to

the classification of public rights of way and it is noted that these have not been progressed.

- 4. To what extent are the key provisions the most appropriate way of delivering the aim of the Bill?** We consider that the key provisions will result in active travel opportunities being incorporated into the planning process of new road improvements schemes. With regard to the objective of providing a fully integrated network and establishing a culture of walking and cycling, the Bill will only partially deliver this aim as implementation by local authorities is dependent on the availability of funding and securing resources through s.106 planning agreements or the Commuting Infrastructure Levy.
- 5. What are the potential barriers to the implementation of the key provisions and does the Bill take account of them?** Resources, both staff and budgetary could be potential barriers to undertaking the principal duties of preparing maps, although the Regulatory Impact Assessment has costed the likely work entailed and it is considered to be achievable, especially in National Parks where there are few settlements with a population over the threshold of 2000.
- 6. 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.** With no duty to undertake the improvements needed to implement the Integrated Network Maps the financial implications of the Bill are limited. More far reaching financial implications could arise from incorporating the needs of active travel in the design of future road improvements schemes (section 8).
- 7. 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.** It is considered that the Bill is concise in setting out the main principles of the legislation. The criteria for designated localities could be included in the Bill.
- 8. Are there any other comments you wish to make on the Bill that have not been covered in your response**

 - Drawing on their local knowledge and experience in the management of countryside access opportunities and Development Plan duties, there is a clear role for National Park Authorities to assist local authorities in the preparation of the two maps.
 - The promotion and development of active travel opportunities contained in the Bill complement a number of objectives in the Corporate Strategies and Plans of the National Park Authorities.
 - Consideration should be given to the inclusion of major centres of visitor accommodation as well as settlements in planning for active travel opportunities.

- While the Bill defines active travel as being non-recreational in purpose, there is concern that recreational routes have not been included in the definition. While it is acknowledged that active travel routes can be used for multiple purposes including health, exercise and leisure, these recreational issues will be overlooked in the map preparation and planning process. There is an opportunity here to encourage local authorities to closely integrate the development of active travel with their other duties in respect of tourism and leisure, economic development and public rights of way management.
- There is concern that the target walking distance of three miles appears to be rather high. The Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000) suggests that a target distance for a range of facilities is between 300 metres and 600 metres and an acceptable distance for those same facilities is between 600 metres and 1000 metres. Clarification is sought on the source of evidence to support the three mile journey distance and consideration should be given to a shorter, more achievable walking distance that would encourage more pedestrian trips.