

Enterprise and Business Committee  
Active Travel (Wales) Bill  
AT 26 - Railfuture

61,Chantal Avenue,  
Penyfai,  
Bridgend  
CF31 4NW

30/02/13

Dear Sir,

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

I submit on behalf of Railfuture a submission to the Enterprise and Business Committee on Active Travel (Wales) Bill.

Yours faithfully,

Rowland Pittard  
Secretary  
Railfuture Cymru /Wales

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**General Comments**

Railfuture campaigns to improve the standard of rail services including quality, availability, reliability standards of information, improved ticketing, station facilities etc and also links with other forms of transport including air bus coach and ferry. It is important that there is ease of access for all to railway stations and bus stations including walking and cycling routes. Full integration of all forms of transport in Wales including walking and cycling is required to reduce the amount of travel by car and produce a healthier life style and achieve economic benefits. We support footpaths that link communitiesto railway stations with excellent examples at Newbridge and Llanharan . The need to provide for recreational travel and its consequential benefits must not be underestimated.

**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.**

Railfuture supports the need for a bill to ensure that adequate resources are made available to maintain and develop the provision for walking and cycling to provide access to railway stations, bus stations and other public transport hubs. It is also essential that provision for recreational walking and cycling is made throughout Wales to further encourage sustainable tourism and the development of the Welsh economy.

Railfuture 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 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. They have also created more

difficult access to railway stations as at Newport, Colwyn Bay and Welshpool where dual carriageway roads have been built adjacent to the station. We can also provide examples of road developments that have made no provision for walkers although they are the most direct links between communities and railway stations and to other facilities. The direct path to Pont Y pant station in the Lledre Valley has a foot bridge missing. 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 as a means of accessing public transport or as forming a part of integrated transport in a region is 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 to the nearest railway station or bus stop. 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 for the safety and convenience of walkers . It is essential that safe convenient route are required for commuters and others to access railway stations , bus stations and bus stops.

**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);**

We support the requirement but there must be a robust method of consultation with potential users especially public transport users with regard to potential new routes. This will prevent the provision of unsuitable routes and blocking up of footpaths which have a purpose for accessing public transport for road schemes that are only available for car owners and not for the young and older people who have no access to a car. 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 especially those which provide access to public transport. This includes local inhabitants and potential visitors

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

We consider it essential that local transport consortia should 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 and providing access to public transport. 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. We consider that these maps should show railway and bus stations and bus stops.

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. Railfuture 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 and improved access to public transport. 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.

**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.

Railfuture would like to see a re-appraisal of the WelTag system, which is biased towards road transport and not to rail including light rail transport and also to walking and cycling. 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 integrated transport and provide for physical activity including recreational walking and cycling and 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. There are good rail links to many parts of the Coastal Path with over 20 stations in Wales adjacent to the path.

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.**

Railfuture, although a member of Sustainable Transport Wales 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 rail users. It focused strongly on the cycling community and not on recreational walking and associated public transport links which have considerable tourism benefits.

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 tourist attraction or out of town shopping/ entertainment centre or a single hotel with a resident population of one person could generate more walking and cycling requirements than a village of 2,000.

Railfuture is awaiting the publication of guidance to see what level of engagement will be recommended with potential rail users and bus travellers.

**4 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 is a need to quantify how people access rail and bus stations that is equally important. 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.

**5 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.

**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.**

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. There could be a shift of funding from rural areas to the larger conurbations in Wales thus disadvantaging communities which already have poor transport links. There could be less funding to improve links to public transport hubs if funding is directed at direct high speed cycle routes to town centres. There has been no direct study into the use of provision of cycle storage facilities at stations and the carriage of cycles on trains. We note that some stations have cycle facilities that have never been used while others such as Cardiff Central have good cycle facilities that are well used. There is only limited cycle accommodation on trains and none of buses and the use of the accommodation on trains can conflict with the needs of other passengers including disabled elderly and parents with young children in buggies and push chairs.

**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?**

Railfuture has 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 .

**8 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 including sustainable transport 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 are concerned that there are moves by Network Rail to reduce the number of road and footpath crossings of the rail network which could disadvantage and reduce access to railway stations.

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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