

Cynulliad Cenedlaethol Cymru / National Assembly for Wales  
Pwyllgor yr Economi, Seilwaith a Sgiliau/ Economy, Infrastructure and Skills  
Committee  
Deddf Teithio Llesol (Cymru) 2013 / Active Travel (Wales) Act 2013  
Ymateb gan Cymdeithas yr Hostelaau Ieuencid Cymru (YHA Cymru Wales) /  
Evidence from Youth Hostels Association Wales (YHA Cymru Wales)

YHA Cymru/Wales response to The Economy, Infrastructure and Skills Committee's post-legislative scrutiny to build on initial post-legislative scrutiny undertaken by the predecessor Enterprise and Business Committee (Active Travel: the start of the journey February 2016).

YHA Cymru Wales provided written evidence to Enterprise & Business Committee on Active Travel (Wales) Bill in March 2013. This new inquiry should be used to inform the Welsh Ministers prior to the five year review of the Act during 2018.

To assess the implementation and operation to date of the Active Travel (Wales) Act 2013, including:

**How far the stated objectives of the Active Travel Act are being achieved;**

The approved maps of existing active travel routes in a local authority area are unfortunately not comprehensive as they only map designated localities as defined by the Act. They are not integrated with cycle ways which have been developed for leisure purposes and they are not integrated with the Local Authority's definitive map of rights of way. Local Authorities have to produce Right of Way Improvement Plans but this work is not integrated with Active Travel developments. The Active Travel Maps are discontinuous and only show areas which have Active Travel Routes. The colour key for the type of route is not present on every published map and there is considerable mapping of routes on roads. It is important to show traffic free routes in a clear manner

A major restriction to integration is the creation of separate budgets for Active Travel and Rights of Way usually administered by two different departments of the local authority.

Integration between adjacent local authorities is on a good will cooperative basis and authorities may have different ideas for development of the Active Travel network within their county.

The All Wales Coastal Path and Welsh National trails have benefited from the overarching work of Natural Resources Wales formerly the Countryside Commission for Wales to provide continuous routes but these are not part of the Active Travel Network.

We have seen little evidence of local authorities having regard to integrated network maps in preparing transport policies. There are examples of the development of Active Travel Routes to city and town centres in many cases provided for by speed restrictions and speed reducing measures on highways rather than discrete routes. Very few Active Travel Routes have been created to rail and bus stations to provide integrated travel with other modes of transport. Facilities for safe cycle storage are essential at railway and bus stations/stops and also in town centres and at places of work. Such safe facilities are few and far between and are usually found at the few

stations in Wales that have full time staff and at places of work where employers encourage Active Travel.

The Act's requirement for Welsh Ministers to report on Active Travel in Wales illustrates that Active Travel is not clearly under the administration of just one Minister. The Annual Active Travel Conference has a limited audience and its findings are not published.

Only two Annual Active Travel reports have been published whereas the requirement is for an annual report. The latest report does not give examples of new infrastructure developments that have been constructed to improve facilities for Active Travel. There are no statistics in the report so it cannot be used to compare progress from year to year. The report does however give a clear indication of the sources of funding and expenditure and the appendix gives details of responsibility and progress narrative of projects and strategic developments taking place.

Welsh Ministers and Local Authorities are required to take reasonable steps to enhance the provision made for walkers and cyclists. There has been no increase in budgets to local authorities, in fact there have been reductions, to enable them to enhance the provision. There have been however some developments using transport grant and other grants provided to local authorities and where prior consultation with regard to these developments has taken place it has been appreciated by local users of the Network. The process of awarding the transport grant to local authorities is controlled by Welsh Government and it is important that coordination between local authorities continues.

The final duty on Ministers and local authorities is to promote Active Travel and secure new and improved routes and related facilities. We have not seen any high powered promotions in recent years although Active Travel is an important contribution to the Nation's well being. There has only been some consultation by Local Authorities but it is important that the public is informed of the consultation and that the appropriate maps are displayed at a larger scale than published on the internet.

### **The effectiveness of subordinate legislation and guidance made under the Act;**

We consider that the present guidance is adequate but difficult to implement because of lack of organisational integration and declining funding. There needs to be a revision of the guidance ensuring that developments to the Network are coordinated with other developments associated with the Right of Way Improvement Plans and are incorporated in one Government and one local authority department. We note improvements in links with the Technical Advice Notes and planning guidance.

### **Any action which should be taken to improve the effectiveness of the Act and its implementation;**

Active Travel and Public Rights of Way must be an essential component of the new City Deals that are being developed in Wales. New integrated routes should also be considered where new housing, industrial, business parks and public service sites are developed. There are examples of business parks in Wales which do not provide for access on foot. Active travel routes should be incorporated as access into rail

and bus networks. The Act must widen its horizons to include leisure travel and support tourism for the economic benefit for Wales. Power assisted bicycles and wheelchairs should be able to use Active Travel routes as should prams and pushchairs. They should not just be considered as well maintained high speed routes for cyclists. They should be a catalyst for healthy safe activity and improve the well being of residents and visitors to Wales.

YHA has participated in the Let's Walk Cymru which aims to increase the physical activity levels of the adult population in Wales by facilitating organised local walks of varying intensity. In 2016-17 a total of £0.26m were provided from Health and Sport budgets. However with integration with local tourist organisations this programme can also be of benefit to Welsh tourism.

### **How far the Act has represented, and will continue to represent, value for money.**

The Act will not provide value for money unless the Network is further expanded to provide integrated travel and not just for journeys to work. It has not made any contribution to decreasing road and rail travel both of which have increased up to 20% during the currency of the Act. It must also cater for inter community travel which often is a shorter but more frequent journey for residents. It must support tourism throughout Wales and provide safe routes away from main roads. Present day discontinuous routes should be connected to give through routes and the use of country lanes as Active Travel Routes is undesirable. We are concerned that money has been spent on discontinuous routes and have seen sections of cycle paths as short as 50 yards in length with full signage for both road and cycle path users. In many cases road markings are confusing. It is important that Active Travel routes are the most direct routes between two locations which they link. There are examples of routes which are circuitous and not direct or even the shortest route available. Sign posting must give accurate distances in preference to estimated times of travel.

### **The effectiveness of the Active Travel Action Plan;**

We consider that this has been limited. There have been complaints that it has directed money and local authority officer time away from developing the Right of Way network and providing well surfaced paths where required. We acknowledge that there has been some good work in providing Safe Routes to Schools but have noted that in some cases Local Authorities have used this money for other road safety schemes. There is no evidence that the choice of new routes is preceded by assessments of the affect of the route on environmental considerations.

The Welsh Government's Rural Development Programme which is providing funding for a "Development of the Walking and Cycling Network in Rural Wales" project is to be welcomed. However YHA has not been involved or consulted with regard to the project which has already identified eight schemes across Wales to fill key gaps in the national walking and cycling network, opening up new opportunities for local people to access jobs, services and tourist destinations using active transport. We note that the project involves close working with regional, but not national, stakeholder groups to develop a detailed delivery plan for each scheme which will expand the reach of the National Cycle Network. We consider that the National Access Forum for Wales should be consulted in connection with national projects.

## **Other capital investments and grants**

A draft update of the Business Case Guidance for 21st Century Schools has been prepared to ensure systematic consideration of how learners travel to schools and colleges funded under the programme. Walking and cycling access in particular will be an important consideration. The new Guidance is expected to be published later this year.

Active travel projects can benefit from other grants, for example the Community Facilities Programme. In 2016, a grant of £480k was awarded from the Programme to extend and improve facilities of a charity focused on accessible and inclusive cycling.

## **Whether sufficient funding and capacity are available to support implementation of the Act itself and wider active travel policy;**

There has not been sufficient funding for the concept of Active Travel to be developed to the level seen in some European countries. Staff reductions in local authorities and in Natural Resources Wales will curtail further developments. There must be an appropriate balance in funding to allow Right of Way networks to develop. This is very important where routes affected by road and housing developments. We note that £8.1 m has been allocated for 54 Active Travel schemes in 2018-9 and trust that sufficient money will be available to Local Authorities to maintain and expand their Rights of Way, the All Wales Coastal Path and National Trails.

## **The operation of the Active Travel Board;**

YHA has had no contact with the Active Travel Board or its members. The Board has not made contact or consulted with YHA, a large nationwide organisation, which has supported Active Travel from its conception. Its remit appears limited and only two sets of very short minutes have been published. The proceedings appear to be presentations with very little discussion of ways to improve and extend Active travel. The Board has not arranged meetings with other stakeholders and appears to not include members representing other fora in Wales such as Wales Environment Link, National Access Forum, tourism interests, young and old persons, disabled and public transport interests.

## **Whether active travel is integrated effectively in wider Welsh Government and local government policy.**

There is little evidence for the integration of Active Travel in wider Welsh Government and local government policy.

YHA would like to continue to promote Active Travel in Wales but there is the need to have a central resource from which information can be extracted. The Active Travel developments in, and the Network Maps for, the twenty two local authority areas in Wales must be able to be accessed at one central location. There must be a coordinated and integrated website provided by Welsh Government for all inhabitants of and visitors to Wales to find the appropriate information. Active travel must not be promoted just as the journey to work, the facilities provided for Active Travel routes must be available to all. We note that a National Communication Strategy for Active travel is being developed. This must be integrated with the data bases of Natural Resources Wales and Travelline Cymru. There must be proper

consultations for new developments to ensure value for money. The health advantages of Active Travel must be promoted. Cycle hire should be promoted and sponsored in cities as in London.

Our original response is appended and many of our initial concerns have been reiterated in the above response

## **Appendix**

### **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 led 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 statistics 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.