

**Improving Public Transport: A joint response from Campaign for National Parks and the Alliance for Welsh Designated Landscapes  
March 2019**

1. Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe and ensure that everyone can enjoy them. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and England and further afield. We also work closely with the Alliance for Welsh Designated Landscapes.
3. The Alliance for Welsh Designated Landscapes represents the interests of National Parks, Areas of Outstanding Natural Beauty and other Designated Landscapes in Wales. The Alliance brings together the expertise of the Brecon Beacons Park Society, Friends of Pembrokeshire Coast National Park, Cymdeithas Eryri the Snowdonia Society, the Gower Society, Campaign for the Protection of Rural Wales (CPRW), National Trust Wales, Cymdeithas y Cerddwyr/ Ramblers Wales, RSPB Cymru, YHA Cymru, BMC Cymru and Wildlife Trusts Wales. Collectively we have long-standing involvement in the legal and policy framework for Designated Landscapes in Wales, and experience of the management challenges they face.
4. Together, we welcome the opportunity to respond to this consultation and have provided a short response to selected questions below. We start with some general comments to explain why the issue of improving access to National Parks and other Designated Landscapes is so important, and why the role of National Park Authorities in particular must be considered when making changes to the planning of public transport.

**Why access to National Parks and other Designated Landscapes matters**

5. Designated Landscapes contribute significantly to the health and well-being of the nation, by providing attractive, healthy places for recreation. They also make a significant contribution to the economy through tourism, farming, and other related businesses. We are very concerned that the major cuts to rural bus services in recent years have significantly reduced the opportunities for visiting Designated Landscapes, particularly for those who do not have access to a car. The need for many visitors to rely on the car also puts at risk the precious landscapes and wildlife in these areas and has a negative impact on many of the benefits they deliver, as a result of the increased carbon emissions and other negative environmental impacts.

6. National Parks receive public funding in recognition of their special qualities and the benefits they deliver. They are national assets, providing natural resources such as clean water and places of peace and tranquillity in a crowded island. They are therefore a critical public service and should be available for everyone to enjoy and to benefit from what they have to offer, not only in terms of leisure opportunities, tourism and a sense of place, but also their contribution to health, well-being and spiritual inspiration. The statutory purposes of National Parks are:
  - To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks
  - To promote opportunities for the public understanding and enjoyment of the special qualities of the National Parks
7. Currently many of those who might benefit the most from the health and well-being opportunities provided by Designated Landscapes are excluded from them due to the lack of affordable and available bus services. Around a quarter of households in Wales do not have access to a car<sup>1</sup> and rely on public transport for most of their journeys. While residents in rural areas generally have higher than average levels of car ownership, there is still a significant minority who do not have access to a car, and these people are increasingly isolated as local shops and services have closed. Bus services are, therefore, important for those who live in Designated Landscapes as well as those who want to visit them. Data on the National Parks indicates that there is currently a strong reliance on the car among visitors as a result of the limited transport options available - around 93% on average<sup>2</sup>. High volumes of traffic can have a negative impact on the tranquillity and natural environment and providing improved alternatives to the car ensures that increased numbers of people can visit without damaging the special qualities for which these areas are valued, as well as allowing people who do not have access to a car to visit them more easily.
8. While there is a need for improved public transport in all Designated Landscapes, it is particularly important to address the travel needs of visitors to National Parks, given that one of their statutory purposes relates to providing opportunities for people to enjoy these areas and improvements to public transport can contribute to both of the statutory purposes of National Parks.
9. For many years, Campaign for National Parks managed the Mosaic engagement programme which successfully recruited and trained hundreds of volunteer community champions to introduce thousands of people from urban areas to the physical and mental health benefits of National Parks. We targeted people from disadvantaged communities which are under-represented among visitors to National Parks. Evidence from the Mosaic community champions demonstrates both the difficulties of accessing National Parks without a car and the benefits of introducing new visitors to the Parks. They cite examples of mental health benefits for people who feel more relaxed and happier as a result of visits to National Parks. There are also examples of people who have been introduced to walking on visits to National Parks and as a result have started walking more for local journeys in their own communities. This has obvious benefits in terms of health and social inclusion.
10. Increasing the opportunities for visitors to reach Designated Landscapes is also good for the local economy in areas which rely significantly on tourism for their economic well-being.

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<sup>1</sup> Statistics taken from <http://gov.wales/statistics-and-research/people-vehicle-licensing-ownership/?lang=en> and <https://www.gov.uk/government/statistical-data-sets/nts02-driving-licence-holders>

<sup>2</sup> <http://www.nationalparks.gov.uk/students/ourchallenges/tourism>

Visitors who use public transport are more likely to spend money on food and drink locally and are more likely to pay for tourist attractions. There is evidence<sup>3</sup> that supported bus services generate between £2 and £2.50 in benefits to local communities for every £1 of local authority spend, as a result of improved access to work and leisure activities and reduced road congestion and carbon emissions. This is before you even take account of some of the wider benefits such as increased spending in local businesses, which has been identified in local surveys. For example, users of the Moorsbus in the North York Moors reported that they spend over £13 per person on average in local shops and cafes<sup>4</sup>. There are, therefore, strong economic development arguments for investing in improved bus services for Designated Landscapes.

11. There are significant environmental benefits to providing improved alternatives to the car particularly where appropriate marketing is used to promote the service to existing car users. It is estimated that the GoLakes Travel Project in the Lake District saved over 41,750 tonnes of carbon in 2014-15<sup>5</sup>. Reducing the number of people who travel to Designated Landscapes by car would also help reduce the associated impacts of carbon emissions, noise pollution, road danger and the blight and severance caused by high volumes of traffic. This would provide benefits to local communities and enhance the experience of visitors as well as providing environmental benefits. There are some locations within the Designated Landscapes where extremely high levels of car use are causing significant problems, and where serious consideration should be given to the introduction of visitor management strategies which include restrictions on car use as well as the promotion of public transport.
12. As the range of public services and facilities in rural Wales continues to decline, it is important to highlight the value of retaining a minimum level of public transport networks all year round, so that those living in these areas without the use of a car have the opportunity to travel to surrounding urban centres to access these services.
13. In this context, we welcome the success of the integrated Traws Cymru bus network, as this effectively provides the only opportunity for long distance travel in some parts of Wales, and particularly the Designated Landscapes, for those without access to a car. We look forward to the strengthening of this network in the future.

### **National Park Authorities' role in improving public transport**

14. The Welsh Government has specifically asked AONB Partnerships and National Park Authorities (NPAs) to 'seek to improve travel planning for visitor attractions and increase the use of demand responsive transport'<sup>6</sup>. Such measures will be essential if aspirations to increase the number of visitors to National Parks are to be achieved without damaging the very features which attract people to these areas.
15. However, NPAs are not transport authorities, so the options they currently have available to them for influencing travel planning in their area are limited, and it is essential that their role is taken into account when introducing the proposals set out in this consultation. Our responses to selected questions below highlight the specific examples we have identified of where changes are needed, but we would urge Welsh Government to ensure that NPAs' role is properly reflected in all the proposals. NPAs have a strong interest in improving

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<sup>3</sup> <https://www.gov.uk/government/publications/value-for-money-of-tendered-bus-services>

<sup>4</sup> <http://www.moorsbus.org/passenger-survey.html> (figures used are for food/drink and shopping in 2016)

<sup>5</sup> <https://www.cumbriatourism.org/wp-content/uploads/2015/09/annual-performance-report-2014-15.pdf>

<sup>6</sup> Valued and Resilient: The Welsh Government's Priorities for Areas of Outstanding Natural Beauty and AONBs, July 2018, p11.

sustainable travel as they have a statutory responsibility to promote opportunities for public enjoyment and understanding of the Parks. It is impossible for them to do this effectively if they are not able to influence change to public transport in their area.

16. NPAs are also local planning authorities, and can use their planning policies to influence travel patterns, but if National Parks are to thrive, spatial and transport planning needs to be properly integrated at local and regional levels. This means that NPAs must be involved when local authorities are preparing local transport plans or planning changes to public transport, so that the vision and policies set out in local development plans is taken into account effectively.

### **Response to selected questions**

#### **Q1. Do you agree that it is important for local authorities to work together with regard to local bus services?**

17. Yes, but it is essential that they also involve other relevant local partners with an interest in local bus services, particularly NPAs where the area in question includes all or part of a National Park. As we set out above, bus services are vitally important for both residents and visitors in National Parks, and it is essential that NPAs are able to influence the travel planning for their area.
18. We endorse the principle of establishing regionally based Joint Transport Authorities (JTAs). It will be important that the remit of these bodies reflects the needs of rural Wales, and that they are not solely focused on the demands and transport needs of urban areas. Option 2 seems appropriate as this will ensure that the diverse needs of different areas of Wales would be better taken into account. While it would be expected that the unitary authorities would take the leading role in the JTAs, it would be important for NPAs to be recognised as statutory consultees of the JTAs.

#### **Q9. Do you agree with our proposals for EQPs, in particular the proposed process for developing and making EQPs?**

19. We note that the Welsh Government is proposing to adopt a similar model for enhanced partnership working to the one introduced in England through the Bus Services Act 2017 and that the provisions of that legislation have been taken into account when developing the proposals for Wales. We hope, therefore, that the Welsh Government will already have taken note of the changes that the Campaign for National Parks secured to the English legislation to ensure that NPAs were listed as 'relevant local authorities' for the purposes of the consultation requirements relating to EQPs. Unfortunately, it is not currently clear that this has happened as the 'improving public transport' consultation document states that 'consultees could include all affected operators, bus passengers and passenger representatives, the Competition and Markets Authority and other local authorities.' NPAs must be included in the list of organisations to be consulted on a proposed EQP. In addition, we would recommend that given their strong interest in bus services in their area, NPAs should be consulted at an earlier stage in the process, prior to a wider public consultation exercise.

#### **Q12. Do you have any other comments on the proposed process for franchising?**

20. We are pleased to see recognition in the consultation document that the new franchising process will require local authorities to undertake a thorough assessment of any scheme proposed prior to its introduction. The legislation should explicitly state that where an area

includes all or part of a National Park then such an assessment should take account of whether, and the extent to which, the proposed scheme has an impact on NPA plans and policies, particularly ones relating to promoting opportunities for public enjoyment and understanding of the Parks. NPAs should also be listed as part of the formal requirement for consultation set out in the legislation.

**Q16. Do you think that local authorities should be able to run bus services directly (i.e. in-house services)?**

21. We would support the removal of obstacles to local authorities running their own bus services directly. In Designated Landscapes, this could provide the opportunity for local authorities to provide bespoke public transport services for visitors in partnership with other stakeholders in that area.

**Q20. Do you agree with our proposal to require the release of open data on routes, timetables, fares and tickets?**

22. Yes, it is important that it is as easy as possible for people to find out about the alternative transport options that exist. This is true everywhere but is particularly relevant in Designated Landscapes where many of those seeking travel information will be visitors who may be unfamiliar with the area. Good promotion of sustainable transport initiatives helps ensure they are well-used and are thus more likely to continue. Releasing open data on routes, timetables, fares and tickets will provide new opportunities for improved travel information, for example, it will make it easier for tourism providers to promote sustainable transport through their websites and marketing materials.

**Q38. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

23. There is an urgent need for more support for measures to improve car-free access to Designated Landscapes, in recognition of the wider benefits this would provide to individuals, local economies and the environment. This should include, but not be limited to, increased financial support for local bus services. There are also a wide range of other initiatives which should be considered. Last year the Campaign for National Parks published a report, *National Parks for all: making car-free travel easier*<sup>7</sup>, which examined existing and current sustainable transport initiatives, and set out recommendations about how to improve the options for travelling to and around National Parks more sustainably. This report examined a wide range of potential improvements including ensuring that bus and train services are better co-ordinated and the use of services such as shared taxis in addition to traditional bus services.
24. The report includes some interesting examples of innovative transport schemes which could be rolled out to meet the needs of visitors in all National Parks if the right support was available. These include Bwcabus<sup>8</sup> which operates in Carmarthenshire and Pembrokeshire, and combines fixed route scheduled bus services with flexible, bookable on-demand connecting routes and Vamooz<sup>9</sup> in the Yorkshire Dales which allows on-demand shared journeys to be booked via an app. However, even successful examples such as Bwcabus often require some level of subsidy given the nature of the areas they serve and many face

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<sup>7</sup> Campaign for National Parks (2018) *National Parks for all: making car-free travel easier*  
[https://www.cnp.org.uk/sites/default/files/uploadsfiles/National\\_Parks\\_car-free\\_travel\\_HIRES DPS.pdf](https://www.cnp.org.uk/sites/default/files/uploadsfiles/National_Parks_car-free_travel_HIRES DPS.pdf)

<sup>8</sup> <http://www.bwcabus.traveline-cymru.info/>

<sup>9</sup> <http://govamooz.co.uk/>

an uncertain future due to the reduced level of funding available for local buses following cuts to local authority budgets in recent years.

25. One of the key recommendations in the *National Parks for all* report is for the introduction of a 'smarter travel National Park' pilot which would test new types of on-demand shared transport services such as Bwcabus or Vamooz together with the use of travel demand management measures, such as road pricing. It would also support the development of sustainable travel hubs – key centres within the Parks offering a range of activities within one location and good car-free access to other locations nearby. The evaluation of the pilot should be used to inform future policy and funding priorities.
26. Within Wales, innovative networks of public transport services with both a visitor and community focus have been operated within the National Parks. In Pembrokeshire, a network of coastal services operates with support from the NPA. In Snowdonia, the Snowdon Sherpa fulfils a similar role. The Brecon Beacons NPA had also funded jointly with adjoining local authorities the Beacons Bus services from surrounding urban areas, but these services have been withdrawn as a result of cuts in budgets. A particularly notable innovation here was the bike bus, enabling high levels of integration between bus and cycle transport, and there is a strong argument for reconsidering the case for better bus / cycle integration of this sort.
27. We support the sentiments for the “*need for improved passenger experience*” (p13) especially in those circumstances where the user experience of the journey is centred around a leisure based activity. The provision and availability of real time information to a variety of modern technology platforms both on board and at the road side is crucial in this respect. All too often in rural areas where no such provision is available, it is difficult to know if a bus is on time and expected, delayed or gone. This increases the chances of passenger disruption. Enhanced real time timetable information linked to mobile phone networks is commonplace in urban situations, but much less so in rural areas where services are less frequent and by their nature based on much longer route travelling distances. Reliability and certainty are therefore key factors in rural circumstances. New technology can provide this.
28. In order to deliver an effective service in Designated Landscapes and other rural areas in future it may be necessary, ultimately, to completely change the way in which bus services are planned and operated. The current deregulated system in England and Wales is never going to deliver the kind of rural transport service that many other European countries have as it does not allow for any cross-subsidy between revenue-generating and loss-making routes. In contrast, the system which operates in most Scandinavian regions allows for some cross-subsidy meaning that there are generally higher levels of service provided in rural areas<sup>10</sup>. In Denmark, Sweden and Norway virtually all bus services have been franchised which has resulted in reduced costs and improved quality. A similar model could develop significant improvements to rural transport in Wales. It should include a requirement for those planning and operating services to provide for access to recreational and visitor destinations as well as key services such as education and healthcare. The case for wider reform of the bus system is described in more detail in the report, *Building a world class bus system for Britain*<sup>11</sup>.

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<sup>10</sup> <http://www.urbantransportgroup.org/resources/types/reports/scandinavian-way-better-public-transport>

<sup>11</sup> [http://www.transportforqualityoflife.com/u/files/160120\\_Building\\_a\\_world-class\\_bus\\_system\\_for\\_Britain\\_FINAL1.pdf](http://www.transportforqualityoflife.com/u/files/160120_Building_a_world-class_bus_system_for_Britain_FINAL1.pdf)

29. Ultimately, significant improvements in local bus services will be dependent on better mechanisms to generate additional revenue to support these services, and all mechanisms to do so need to be available for consideration. Both the Welsh Government and local authorities need to give greater priority to funding support for bus networks.
30. Finally, it is important to consider this consultation in the context of the *Wellbeing of Future Generations (Wales) Act 2015*. A minimum standard of accessibility to facilities and services should be seen as a basic wellbeing requirement. The availability of public transport services for both residents and visitors in rural areas therefore takes on a higher significance than it might in urban areas, where services are more readily available within walking distance.

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