

Active Travel Bill Team  
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13 August 2012

Dear Sir/Madam

## **Consultation on Active Travel (Wales) Bill**

### **1. Introduction**

The 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. Our work in Wales is informed by CNP Cymru, which includes representatives from each of the National Park Societies and other bodies such as CPRW and the National Association of AONBs. The National Park Authorities in Wales and National Parks Wales have observer status.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

In responding to this consultation we have focused on the implications of the proposals for access to, from and within National Parks in Wales and any potential impacts on the statutory purposes of National Parks.

In Wales, National Parks comprise about 20% of the country’s land mass and already contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for active travel and recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy of Wales through tourism, farming, and other related businesses. We believe that the nationally designated landscapes of Wales should be maintained as distinctive and unique tracts of countryside, which are also adaptable and resilient to future pressures such

as climate change. Much of the success of National Parks is attributable to the high quality of the landscape itself.

## **2. Our Comments**

We are pleased to have this opportunity to respond to the Welsh Government's consultation on an Active Travel (Wales) Bill. We are keen to see improved access to, from and within National Parks, particularly by sustainable modes of transport so we welcome any measures aimed at encouraging walking and cycling, including the proposed duty on local authorities to identify routes that are safe and appropriate for walking and cycling. We also welcome the Welsh Government's support for a hierarchy of road users which prioritises non-motorised transport users over cars. However, there are some elements of the proposals which we have concerns about or where we would welcome further clarification. These include:

- Requiring physical measures, such as traffic calming on rural roads, may not always be necessary or appropriate, particularly in protected landscapes, where there could be a significant visual impact.
- The proposal to amend some of the definitions of rights of way in Wales to make it easier for footpaths to be shared with other users could actually be counter-productive if it deters people from walking.
- The emphasis on early engagement with local communities and representative groups is welcomed but this needs to include those who would like to walk and cycle in an area as well as those who already do.

We have provided further information on each of these issues below and have chosen not to answer all of the consultation questions.

### **2.1 Design of the routes**

Whilst we welcome the emphasis on ensuring that the routes that Local Authorities identify are safe and appropriate for walking and cycling, we are concerned to ensure that this does not result in the introduction of inappropriate physical measures on rural roads in National Parks, as this could have a detrimental impact on the visual amenity of these protected landscapes.

Whilst traffic calming, segregated routes and additional signage may be required in built-up areas or on heavily trafficked roads, such engineering solutions will not necessarily be required in rural areas. Even where pedestrians and cyclists would be in proximity with motorised traffic, the extent to which physical measures are required will be heavily dependent on the volume of traffic using the road and would not be necessary on lightly trafficked roads. Local Authorities should be given greater flexibility to decide where physical measures may be required and there should not be an expectation that engineering solutions are always required. If Local Authorities identify routes in National Parks where they feel additional measures are needed to make them safe for walkers and cyclists, they should work closely with the relevant National Park Authority, to design traffic calming or other measures that are appropriate to the area's setting. The kind of measures that could be considered include varying verge maintenance, soft landscaping, road surface treatment or planting grass in the middle of the road.

Similarly, we welcome the proposal for new design guidance for non-motorised routes but it is essential that this guidance takes account of the need to design routes that are appropriate to their setting in National Parks. In preparing this guidance, the Welsh Government should draw on the work on Quiet Lanes by the Countryside Agency and other organisations, such as CPRE (see for example: [www.cpre.org.uk/resources/transport/roads/item/download/378](http://www.cpre.org.uk/resources/transport/roads/item/download/378)). The Quiet Lanes approach is aimed at providing opportunities for people to cycle, walk and horse ride in a safer environment whilst still protecting the character and tranquillity of country lanes. The Countryside Agency also published general guidance on the design of rural routes and networks.

## **2.2 Amendments to rights of way definitions**

We note the intention of the rights of way amendments is to remove inconsistencies and to make it easier for Local Authorities to allow cyclists to use footpaths. However, we are very concerned about the proposal that some rural footpaths may be appropriate for other users such as horse riders or carriage drivers. Any amendment to the definitions to allow this to happen would need to be very carefully designed to ensure that it was only used where routes can be safely shared, otherwise there is a very real risk that these amendments could actually undermine the original intention of the Bill by deterring people from walking. Most footpaths would be too narrow for walkers to share them safely with carriage drivers, or even horse riders, and equestrian use of footpaths can lead to the path surface becoming very uneven or muddy, making them much less safe and attractive for walkers.

## **2.3 Engagement**

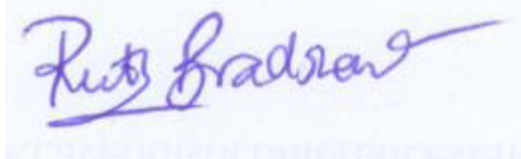
We welcome the emphasis on early engagement with local communities and representative groups. However, to fully understand the routes and facilities that people would prefer, it is essential to consider not only the views of those who already live in, or visit an area, but also the needs of those who would like to visit but may currently be deterred from doing so, perhaps because of a lack of transport options.

For those without private transport, the cost and limited availability of public transport can make it very difficult to access the National Parks and to travel around once they get there. Improving walking and cycling options, particularly those which allow people to combine public transport with cycling to complete longer journeys from urban areas, could play a key role in widening access to the National Parks as well as encouraging those with cars to try an alternative mode of transport.

The kind of routes and facilities that would be required to provide these ‘joined-up’ journeys will only be identified if local authorities work closely together and extend their engagement activities to include potential visitors to an area. We would be pleased to help with this activity by putting relevant local authorities in touch with the Community Champions we are recruiting through the Campaign for National Parks’ Mosaic project in Wales. This has been working with ethnic minority communities in Newport, Cardiff, Swansea, Bangor and Wrexham since January 2012 and aims to introduce thousands of new people to the physical and mental health benefits that National Parks offer over the three years of the project.

We trust that these comments will be helpful in the future development of the Active Travel (Wales) Bill. We would be pleased to continue working with the Welsh Government and other partners as the plans for this Bill progress to ensure that the proposals are designed in such a way that they provide improved access to National Parks in Wales and do not detract from the attractiveness of these special places.

Yours faithfully

A handwritten signature in blue ink that reads "Ruth Bradshaw". The signature is written in a cursive style with a long horizontal flourish at the end.

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Campaign for National Parks

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