



campaigning
by the
Railway Development
Society Limited

Cymru Wales

Active Travel Bill Team
Transport Policy and Legislation
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12th August 2012

Dear Sir,

Consultation Response on Active Travel (Wales) Bill

Railfuture is a nationwide organisation which has been established for over 50 years and is the UK's leading independent organisation campaigning for better rail services for passengers and freight. Railfuture Cymru Wales actively promotes the use of and improvements to rail travel throughout Wales.

Railfuture's mission is to be the number one advocate for the railway and rail users. Railfuture seeks to move more people and freight from road and air to rail, by campaigning for cheap, convenient rail services for everyone, better links for buses, bikes and pedestrians and creation of urban Tram, Light Rail and Metro systems. The use of public transport has environmental, health and social inclusion benefits. This is enhanced by integrated transport and the opportunity to walk or cycle to railway and bus stations and to bus stops. Railfuture has produced a Development Plan for the Railways of Wales.

What are your views on the proposals for Local Authorities to have a duty to:

- identify and map the routes within their areas that are safe and appropriate for walking and cycling
- identify and map the enhancements that would be required to create a fully integrated network for walking and cycling and develop a prioritised list of schemes to deliver the network
- deliver an enhanced network subject to budget availability and following due process
- consider the potential for enhancing walking and cycling provision in the development of new road schemes

Railfuture supports the identification and mapping of routes that are safe and appropriate for walking and cycling including pavements adjacent to roads. These routes especially when used for accessing public transport should be well lit and have suitable surfaces for walking (no mud) and for buggies and where appropriate for wheelchairs and cycles. These routes should not be obstructed by overhanging vegetation or available for use by motorised vehicles.

Priority should be given to routes to be used by pedestrians many of whom have no other transport to reach rail and bus stations. These routes should for part of the integrated transport/network provision in an area. The mapping should include every railway station and bus stop and also the facilities at those locations including shelters, disabled access and cycle storage. Consideration should also be given to

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mapping the method of crossing railway lines and roads i.e. over and under bridges, ramps, level crossings and pedestrian crossings.

We support the identification of enhancements which will require a second map not to confuse users with which is already on the ground. Priority should again be given to the needs of pedestrians over those of cyclists where funds are limited. Pedestrians are more numerous than cyclists and more prone to accidents on unsafe routes. Cyclists have the choice of modes of transport but many pedestrians do not have this choice.

We support the provision of an enhanced integrated transport network which includes walking and cycling especially to reach public transport and other facilities required such as hospitals and health centres, educational establishments, council offices, shopping locations and entertainment facilities. This provides for improved social inclusion and health benefits.

It is essential that walking and cycling provision is taken into account in new road schemes but it is also equally important for new housing, industrial and shopping developments. Some retrospective work should also be taken in conjunction with earlier developments that have discouraged walking and cycling. We can quote examples such as Welshpool and Port Talbot where new roads have made it more difficult to reach the railway stations. We can also quote examples where new roads, which are well lit and have wide verges, are banned to pedestrians even though they are the most direct route to a railway station. Examples can be provided of more circuitous routes from communities to their railway station because of lack of bridges over streams and rivers. In the Llynfi Valley the newly created unlit cycle path has been promoted as the route to the railway station at Maesteg where as a much shorter route is available on a well-lit pavement adjacent to the main road. There are examples of good developments including the river foot bridge at Carmarthen linking the town centre with the railway station and the second bridge at Holyhead again connecting the town centre with the railway station and ferry port.

Pedestrians/walkers should be directed to the shortest route often following a road and not directed to use a longer route that has been created away from the road as a cycleway. We continue however to support the joint use of paths in all cases.

How do you think the duty should be enforced?

There are three organisations involved Welsh Government, the Transport Consortia and Local Authorities and all three will have roles in enforcement. It is important that Local Authorities establish what is needed for their communities and for the Transport Consortia to develop coordinated plans for their area. It is important that actions are standardised across Wales and funding equably distributed. European convergence funding should be available for some improvements.

Do you think the type of route and facilities that Local Authorities be required to map should be specified in guidance or regulation?

There should be specified guidance to give a standardised mapping across Wales and to prevent anomalies at County boundaries. There must be clarification of the roles of Transport Wales and the new environmental body for Wales to ensure that priority is given to footpath provision before the needs of cyclists and road users. The provision and use of footpaths and cycle ways by residents and tourists for recreational walking and cycling should be diminished.

What are your views about revising rights of way definitions, for example allowing cyclist to use footpaths, or equestrians to use cycle paths?

Multiuser paths can create problems. All paths should be available for pedestrians and if possible family use with buggies.

We do not support the mapping of short section of cycle path in some cases no more than a few yards as being appropriate. We do not support the road marking at traffic lights that give cyclists priority. We have seen cases of cyclists weaving through traffic and creating dangers to pedestrians at the crossings. There is no need to revise the rights of way definitions to enable cyclists to use footpaths. If cyclists are already using footpaths or Local Authorities believe that a route should be made available for cyclists then there is already existing legislation, which enables the local authority to convert a footpath into a

cycle track. Many Local Authorities do not make use of this legislation because it is time consuming and complex and the routes that are converted must then be taken off the Definitive Map of public rights of way if they are existing registered public footpaths.

In order to rectify these problems legislation must be brought forward which makes the conversion process much simpler and enables local authorities to add footpath/cycle tracks to the Definitive Map. In that way the public will be able to obtain a better picture of where the walking and cycling routes are. Furthermore, those who are opposed to footpaths being converted to cycle tracks because the routes are taken off the Definitive Map and they might feel a sense of loss as a result will not have that issue. If new legislation were made to alter the definition of a footpath or certain footpaths to enable cyclists to use them then there would be issues for the Local Authority and the public rights of way network. Firstly, there would be two types of public footpaths and therefore the Definitive Map and Statement would have to be altered to show these new routes. In practical terms there may also be issues with regard to some of the structures on, and surfaces of, existing routes. Finally there could be issues with landowners and the need for local authorities to pay compensation for suddenly allowing cyclists to use some routes where currently there use would be a trespass against the landowner.

With regard to the suggestion of changing the definition of a cycle track to enable equestrians to use those routes then this would need to be looked at on a case-by-case basis. There may be local circumstances where the conversion of a cycle track to a bridleway would be appropriate but in other instances this may not be the case. Therefore, there should be no wholesale change in status of footpath/cycle tracks to enable equestrians to use them all but there should be a simpler way for Local Authorities to achieve this.

The issue of showing the routes on the Definitive Map and Statement and the practicalities outlined above would also apply in this instance.

There appears to be a loss of distinction in the consultation document as to the difference between a public footpath and a footway/pavement. One important distinction for cyclists is that unless a footway has been formally converted into a shared cycleway/footway by a Traffic Regulation Order then it is a criminal offence for cyclist to ride on it. As highlighted above cycling on a footpath is a trespass against the landowner. Revising the definitions of either to allow cyclists to use footpaths and/or footways would have serious implications.

We do not approve of any suggestions that footpaths/cycle ways/bridleways should be by motorised scooters, motorbikes or pony and traps. They must be kept to the exclusive use of pedestrians and where permissible by cyclists and horse riders. We suggest that all walking and cycling routes should be put on one map otherwise the network is going to look disjointed.

The following are given as difficulties presented by joint use:

Cyclists using footpaths requires separate "lanes" for pedestrians and cyclists to be marked on the path to prevent the problems of cyclists running into pedestrians. The lanes need to be wide enough for both users including families walking with buggies. The pedestrian lanes frequently have obstacles such as lamp posts, signposts and other roadside clutter reducing their width and creating additional hazards. Examples of unfavourable treatment of pedestrians can be seen at many locations throughout Wales. In the same way as cyclists often need traffic calming on roads because of the problem of faster motorised vehicles, similarly there is a need to separate the cycle and walking lanes as there appears no mechanism to limit the speed of cyclists on combined paths.

With the increasing use of earphones and mobile music players there appears to be increasing anecdotal evidence of pedestrians being unaware of bikes closing in behind them on paths. We also condemn the use of mobile phones by cyclists when on the move.

There does not appear to be universal use of warnings by cyclists approaching pedestrians on joint usage paths. This problem needs to be specifically addressed on any paths that change from pedestrian to joint usage because existing users will not be accustomed to the new risks. However the problem exists on all joint paths and needs to be addressed

What are your views of the proposal for new design guidance?

Paragraph 81 of the consultation document indicates that development of the new design standards will be taking place independently and that no new legislation will be required to take those forward. The document also suggests that the Welsh Government will consult separately on the new design guidance. We agree that there is a need for a proposed single set of national design standards for walking and cycling routes and where appropriate bridleways.

There is a need to remove the silo mentality in many local authorities where road, housing and industrial developments take place and consideration is not given to footpath and cycleway developments. We can give examples of situations where direct routes to stations and railway stations have become more circuitous because of other developments such as new roads, the construction of housing estates with no through walking/cycling routes and barriers created by industrial development.

What would the costs and the benefits be to you or your organisation (or the people your organisation represents)?

The bill will help create improved access to public transport- trains, buses and ferries and hence improve the integration of public transport and improve demand for public transport.

We have asked a series of specific questions. Is there anything else that you would like us to consider as part of the development of the Active Travel Bill, or wider active travel activity?

If additional funding is made available to Local Authorities to implement any new duties arising from these proposals this could be insufficient due to the current economic conditions. As a result Local Authorities are only likely to implement one or two schemes per year. Therefore, the decision on which schemes to implement could result in a bidding process as per the previous Safe Routes to School and current Safe Routes in Communities schemes. We would like to see as a priority Safe Routes to railway stations.

One of the main aims of the proposals as put forward in the consultation document is to encourage the public to walk and cycle more for shorter journeys. We are aware that there are a number of reasons why people currently use cars for these journeys. For example they find cars more convenient and it can take less time. There may also be other barriers to using walking and cycling routes and these should be removed especially to access public transport, which in turn will reduce car usage. These barriers include safety lack of lighting, poor signposting, stiles, muddy surfaces to footpaths and overgrowing vegetation such as members of the public not feeling safe.

The Welsh Government needs to consider how it can provide a stimulus in other areas to bring forward a change in attitude which would encourage more people to walk and cycle on shorter journeys including those which include access to railway and bus stations and bus stops. The current proposals should not be seen in isolation but must be considered by the Welsh Government as part of an integrated transport system. Within any proposals that are brought forward as a result of this consultation there must be linkages to public transport, transport hubs, etc. Indeed it should be made clear in any Guidance, particularly if funding is being made available from the Welsh Government that they would not support any scheme that does not tie in with and provide an integrated transport network for the public. There is concern that if additional funding is to be made available and administered by the local transport consortia that this may result in schemes being developed purely in relation to journeys to work and school. Railfuture however wishes to support schemes that improve integrated transport and access to railway and bus stations and Recreation and Tourism could become third class citizens in terms of funding. There are many organisations that want to see the network of pedestrian, equestrian and cycle routes being developed as a recreational resource for local residents but also to be used as an economic resource in the tourism industry. This will improve social inclusion and has health and environmental benefits.

Additional points

The Train Operating Franchise in Wales does not specifically require or call for the provision of CCTV or cycle storage then this responsibility to decide and fund provision rests ultimately with the client, which is the Welsh Government; rather than the contractor (Train Operating Company). The government should

therefore advise the Local Authorities of the sites and timescales where they are authorising the provision or upgrade of these facilities. While most trains have provision for the carriage of a couple of bicycles it is noted that while busses that serve the airport have been specifically modified for the provision of large luggage. The carriage of bicycles on Traws Cymru bus services has apparently been discontinued. This raises the question of which organisation should be identifying the requirements for facilities for bicycles on busses. Following this there is the question of where and how the funding will be dealt with, with regard to the privatised commercial bus and rail companies.

We have seen the provision of cycle storage facilities at unstaffed railway stations in Wales. We have never seen these facilities used except where expensive locked storage is available at stations such as Tywyn. These facilities can only be used by holders of the key or padlock to these lockers. Conversely at staffed stations with CCTV and other security arrangements cycle storage is well used with examples at Cardiff and Bridgend and there is need for further storage at these locations. Cycle provision on trains is limited and can compete with space needed by wheelchair users, buggies and luggage. Cycles can take up the space of four seats. This further reinforces the need to provide suitable access to stations for use by pedestrians.

The provision of cycle storage in the Netherlands is often by franchised operators adjacent to railway stations that provide storage and other facilities for cyclists.

Yours faithfully,

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