



Department for Transport consultation on Cycling and Walking Investment Strategy

A response by National Parks England

May 2016

Summary

1. National Parks England (NPE) supports the policy-making process by co-ordinating the views of the nine English National Park Authorities (NPAs) and the Broads Authority. It is governed by the Chairs of the ten authorities. Our response represents the collective view of officers who are working within the policies established by the NPAs and Broads Authority and follows internal consultation amongst officers of NPE's Transport and Access Officers Working Groups. It should be noted that all references to 'National Parks' in this response refer to the nine National Parks and the Broads. We are happy for our response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.

2. NPE welcomes the opportunity to comment on the Draft Cycling and Walking Investment Strategy. National Park Authorities have a quality product in the National Parks and a proven track record in delivering infrastructure that provides economic, public health and transport benefits and contributes to behavioural change. We would highlight in particular:

- National Parks cover almost 10% of England and over 50% of the population live within 1 hours travel of their closest National Park;
- the English National Parks and surrounding areas collectively attract 90m visitors per year who spend more than £4 billion a year and support 68,000 jobs (FTE);
- walking and cycling are already hugely popular activities in National Parks as means of enjoying these iconic landscapes, but they also provide significant opportunities to enable new people to try these activities that can then translate into behavioural change when back home;
- the DfT's evaluation of cycling investment schemes promoted by National Park Authorities has shown an average Benefit Cost Ratio of more than 7:1, which compares favourably against schemes in cities;
- there is much potential in National Parks to develop exciting new and accessible routes and networks using the range of unsurfaced unclassified roads, former rail tracks and other routes found within them; and
- the Tour de France Grand Depart, the Tour de Yorkshire, the Tour of Britain and the Eroica cycle festival have proved extremely popular with visitors and showcased the range of opportunities to be found in National Parks.

3. To play our full part in delivering the ambitions of the Strategy, **National Parks England recommends that Strategy should make it clear that applications for funding from National Park Authorities and the Broads Authority will be welcomed as part of a collective ambition to enhance cycling and walking infrastructure and invest in the nation's assets.**

4. National Parks England welcomes and supports the broad ambitions of the Investment Strategy. We do believe, however, it needs to be improved in a number of respects. In particular, by:

- translating the broad ambitions into clear and measurable targets;
- giving far greater prominence to the role of the leisure economy and responding to the investment needs that it requires;

- making much stronger links with Defra's 8-point plan for England's National Parks and with the recently published Sports England Strategy for encouraging physical activity;
- providing access to standard tools for assessing the economic benefits of walking and cycling;
- providing financial support for the initial feasibility and bidding process and not just the delivery phase;
- including a few case studies relating to rural areas (our response provides a couple);
- instructing Local Enterprise Partnerships that NPAs are eligible for Growth Funding for infrastructure schemes where they can demonstrate schemes further the Government's ambitions;
- ensuring the leisure sector is specifically represented on the Expert Group that is being established; and
- responding positively to the five tests that British Cycling and other NGOs have promoted for the Strategy.

Detailed response

A quality product and proven track record

5. National Parks England welcomes the opportunity to comment on the "*Department for Transport Cycling and Walking Investment Strategy, March 2016*".
6. National Parks cover almost 10% of England and over 50% of the population are within an hour travel of a National Park. National Parks are a resource for all to benefit from with high quality landscapes, attracting people from all ages and walks of life. National Park Authorities have experience in promoting new access and recreational opportunities through working in partnership with others. They help to boost confidence of potential cyclists and support behavioural change while delivering wider social and economic benefits and developing community cohesion between rural and urban communities.
7. Many people use the rights of way network for walking, cycling and horse-riding - as a means to enjoy the special qualities of the area. The rights of way network provides the means to gain access to other recreational activities as well as providing opportunities for physical and mental well-being. There are also other multi-use routes within National Parks such as unsurfaced unclassified roads and former rail tracks which have the potential to form a valued part of the linear network. By virtue of their nature these can offer accessible routes suitable for everyone no matter their level of ability, giving them the opportunity to take part and benefit. Together these routes can be promoted and branded as the National Park's Miles without Stiles.
8. The English National Parks collectively attract 90 million visitors per year¹; offering an unequalled opportunity to influence their travel behaviour, at a point where they are most receptive; on their holidays or enjoying their leisure time.
9. English National Parks have benefitted from Government investment in sustainable travel and cycling over recent years, culminating in the four successful bids to the Department's Linking Communities Grants to Support Cycling in National Parks in 2013². The successful National Park Authorities collectively received £17 million pounds funding for cycling schemes in and around their boundaries, with NPAs working hard so that each bid provided substantial match funding. Each project has achieved significant benefits for visitors to and residents of these National Parks.
10. At the same time, evaluation undertaken as part of the respective schemes has demonstrated significant economic benefits from new cycle infrastructure in National Parks³. The Department's own

¹ http://www.nationalparksengland.org.uk/_data/assets/pdf_file/0007/338362/3209-NPE-INFOGRAPHICweb.pdf, it should be noted that some people visit more than one national park in a year and will therefore be counted more than once.

² The successful National Parks were; Dartmoor, New Forest, Peak District and South Downs.

³ Evaluation in relation to the Pedal Peak II Project has indicated that visitors to Hassop Station on the Monsal Trail spend approximately £52.00 on average as part of their day out. This spend is on such items as travel, parking, cycle hire, food and drink, shopping and accommodation.

'Value for Money Assessments for Cycling Grants deemed that collectively the National Park projects delivered a Benefit to Cost Ratio (BCR) of more than 7:1, with the individual schemes ranging between 3:1 and 13:1⁴. The average BCR across the four National Parks was higher than the average across the equivalent City schemes (5:1), demonstrating the value of investment in cycling within National Parks.

11. The Department for Environment, Food and Rural Affairs' [8-Point Plan for National Parks](#) includes an ambition to '*Promote National Parks as world-class destinations to visitors from overseas and the UK.*' The provision of iconic walking and cycling routes within National Parks has a key role to play in attracting international visitors. For example, we know that recent cycling events such as the 'Tour de France Grand Depart' (2014), the Tour de Yorkshire, the Tour of Britain and the Eroica cycle festival have proved very popular with visitors and have showcased their respective national parks as great places for cycling. Similarly national parks have long been known as great places for walking, attracting visitors from all over the world.

12. The 8-Point Plan for National Parks recognises the Health and Wellbeing benefits of National Parks, with an ambition to '*Promote innovative schemes for National Parks to serve public health*', recognising the benefits that green prescriptions can bring. A further ambition in the Plan is to '*Realise the immense potential for outdoor recreation in National Parks*', whilst recognising the '*need to support initiatives that encourage this kind of activity and the infrastructure to facilitate it*'. We were particularly pleased to see reference made to the Cycling and Walking Investment Strategy within the Plan and see a real opportunity to take forward shared ambitions.

13. Our National Parks have a key role to play, and the experience to deliver quality infrastructure. In the remainder of our response we would like to share some general comments based on this experience, as well as answers to the more detailed questions raised in the consultation document.

General Comments

14. National Parks England welcomes the Government's overall ambition for England, to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey. We also welcome the aims of doubling cycling activity; reversing the decline in walking; reducing the rate of cyclists killed or seriously injured on England's roads and increasing the percentage of children aged 5-10 years that walk to school. However we would welcome clarity on the precise targets being adopted, how they will be monitored and whether the Strategy will include Key Performance Indicators.

15. We also support the stated commitment of £316 million pounds to be invested in walking and cycling from 2016/17-2020/21. However, with the majority of this funding (75%) already earmarked to Bikeability, Cycle Ambition Cities and Highways England, there is only a small amount of funding left for investment elsewhere. When this is coupled with the apparent urban focus of the Investment Strategy, there is likely to be a shortfall of funding for National Parks, compared with their collective ambition/potential and track record of delivery in this field.

16. In addition to the potential lack of funding available, it is not apparent anywhere in the document that applications for funding from National Park Authorities will be welcomed, either in partnership with constituent / neighbouring highway authorities or on their own behalf. Although not the case for all National Parks; where multiple highway authorities and Local Economic Partnerships are involved such as in the Peak District, building bidding / delivery partnerships is both complex and time-consuming. At the same time the lack of focus on the leisure market in the Investment Strategy it is likely investment in infrastructure within National Parks will not be seen as a priority by those authorities who are eligible to apply for funding. A lack of future investment in walking and cycling infrastructure, within National Parks could undo the good work and progress of recent years and thus impact on the rural economy in these areas. The provision of good facilities for leisure walking and cycling can encourage visitors to adopt new habits that can then be transferred to everyday journeys.

17. British Cycling with the support of other organisations⁵ has suggested 5 tests against which the Cycling and Walking Investment Strategy should be judged; these are: -

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/348943/vfm-assessment-of-cycling-grants.pdf

⁵ Bicycle Association, CPRE, Cycling UK, Living Streets and Sustrans

1. A pathway towards achieving the Government's ambition for cycling and walking in England
 2. A plan to at least meet clear targets for both cycling and walking and other outcomes
 3. A package of committed Government investment and other potential funding to deliver the Strategy
 4. A framework for assessing performance
 5. Independent governance that challenges and supports
18. National Parks England supports this approach to testing the success of the Strategy.
19. National Parks England is keen to provide the Department with an ambitious delivery plan for walking and cycling across all of the 10 National Parks. Delivery of this Plan would showcase the National Parks as exemplars for walking and cycling within England, bringing a range of benefits including to the economy, tourism, transport, road safety and public health. However in return for delivering these benefits, a committed funding regime from cross-Department sources would be required. It would also be advantageous if the funding were to be administered in a similar fashion to the Heritage Lottery Fund, with an initial tranche available to develop proposals, through to funds for the delivery phase.

Detailed Comments

20. Page 16; Figure 3 – The opportunities for cycling and walking – this figure makes reference to the fact that *'more than 9 out of 10 people live within a 6 minute walk of a bus stop'*. However, as the Department will be aware, many bus services within National Parks are under threat due to recent cuts to local authority budgets. In some cases, the loss of public transport services might encourage the uptake of walking and cycling as an alternative. However for this to be the case, investment in the provision of safe routes away from main roads will be required, otherwise, those public transport journeys will almost certainly be replaced by journeys made by private car.

21. Page 18; Cycle Ambition Cities – the Cycle Ambition Cities Programme was announced at the same time as the Grants to Support Cycling in National Parks Programme in 2013. We recognise the benefits of investing in cycling in cities in terms of the populations that can be influenced, and therefore the continuation of funding through to 2017/18. However, it would have been equally beneficial to extend the programme for National Parks in order to build on what has been achieved and also to allow those National Parks that were unsuccessful in 2013 to be able to bid for funding for investment in cycling. Even at this late stage, we would encourage the Department what more it can do to support infrastructure initiatives in National Parks that will support the outdoor recreation and through it the rural economy.

22. Page 22; Healthy New Towns, Department of Health – Walking Cities – whilst we recognise the large populations that can be reached in undertaking cycling investment in town and cities, it is essential that further investment is made available to National Parks. There are a number of reasons for this; alternatives to the private car are under increasing threat in National Parks, with widespread cuts to subsidies for public transport. Whilst this may encourage the uptake of other alternative modes, rural roads are generally less well maintained, and within national parks, are often remote, narrow, and in many cases hilly. When this is combined with the higher speeds of traffic, it means that their suitability for use by all but experienced cyclists is limited. Similarly, pavements alongside National Park roads are generally limited to those within settlements. This reduces the likelihood of walkers being able to make utility journeys on foot. This means there is a particularly strong case for promoting off road infrastructure, particularly in areas that generate high volumes of visitors such as National Parks.

23. In addition to the requirement for investment to encourage modal shift of residents and visitors to National Parks, the Parks are a key tool for encouraging modal shift elsewhere. Providing visitors to National Parks with facilities that enable them to participate in walking and cycling in an enjoyable and safe way can lead to changes in lifestyle that bring a range of health, economic and transport benefits beyond the Park's boundaries.

24. Page 24-25; National Planning Policy – National Parks England recognises and welcomes the role that both the Community Infrastructure Levy and Section 106 agreements can make in providing

funding for walking and cycling links. However, in the case of National Parks, as the National Planning Policy Framework (NPPF) acknowledges National Parks have particular statutory purposes⁶ that means that the scale of development is to be restricted. As a consequence, there will be limited opportunities for investment in the wider walking and cycling network in National Parks from these sources of funding.

25. Page 29, Paragraph 6.5 – we are pleased to see that the Committee will be monitoring wider Government ambitions in relation to cycling and walking but unless these other departments have funding specifically for these measures then the risk is that little progress will be made. These departments may look to DfT to fund infrastructure for walking and cycling, however, the availability of this funding is not apparent in the Draft Investment Strategy.

26. Case Studies – the majority of the Case Studies contained within the Strategy again demonstrate its largely urban focus. Without good examples of projects in National Parks being highlighted by the Department, it is difficult to persuade those bodies with available funding to invest in walking and cycling both within and linking to National Parks. We have provided a few case studies below.

Consultation Questions

Question 1: The Government would be interested to hear views on the approach and actions set out in section 8 of this strategy.

27. Overall, National Parks England is supportive of the Government's aims and objectives behind the Strategy. However, as stated previously, there is a particularly urban focus to the Strategy and insufficient account taken of the needs of the entire population to recreate safely in places like National Parks. We do not discount the need to invest in our towns and cities, but it is nevertheless disappointing that the achievement of National Park Authorities in place shaping and encouraging behaviour change over recent years is not currently reflected in the document.

28. There also appears to be a lack of linkage between the aims and aspirations of this document and the Department for Environment, Food and Rural Affairs' 8-Point Plan for National Parks. This is of particular concern given the 8-Point Plan makes reference to this Strategy as a means of supporting initiatives to '*realise the immense potential for outdoor recreation in National Parks*'.

29. We note that the majority of funding that the Government has committed to supporting the Strategy is already earmarked (75%). This lack of available funding, coupled with the resource heavy requirements for bidding for funding may make it difficult for smaller authorities, including National Park Authorities, to access funding, again slanting proposals towards the larger urban focussed bodies. This could be addressed, at least partially, if DfT was to engage with Local Economic Partnerships that include National Parks within their boundaries and direct them to make funds available for walking and cycling projects within National Parks, emphasising the valuable Benefit Cost Ratio of such schemes to the Partnerships.

30. Cross-boundary partnership working should also be encouraged. The Pedal Peak II Project, for example, demonstrated the value of such partnerships in delivering cycling schemes within a National Park. Combining efforts and funding can generate more iconic routes and a greater availability of match and in-kind funding.

Question 2: The Government would be interested to hear views on the potential roles of national government departments, local government, other public bodies, businesses and the voluntary sector in delivering the strategy and what arrangements could best support partnership working between them

31. National Parks England believes that National Park Authorities have a key role to play in delivering the Walking and Cycling Investment Strategy. Walking and cycling are amongst the most popular activities for visitors to National Parks. For example, within the Yorkshire Dales National Park, 80-87% of visitors go walking and 3-5% cycle, whilst in the Peak District, 78% of visitors go walking and

⁶ Section 61, Environment Act 1995, <http://www.legislation.gov.uk/ukpga/1995/25/contents>

10% go cycling or mountain biking. This picture is generally replicated across the other English National Parks.

32. Over recent years, National Park Authorities have proven their ability to deliver walking and cycling schemes, including through building often large and complex partnerships with constituent authorities and other public bodies. National Park Authorities have also led the way in bringing forward Cycling Strategies and Action Plans. For example there has been a Cycle Strategy in place for the Wider Peak District since 2014. However, in order to help deliver both the Department's and local strategies, National Park Authorities need to be able to access funding. The urban focus of this document appears to limit their opportunities to do so.

33. Our concerns could be addressed through creating a separate Cycling and Walking Investment Strategy for National Parks, including a bespoke funding mechanism. All of the English National Parks already play a key role in promoting walking and cycling, and thus encouraging behaviour change as part of everyday lives. Collectively we have a great ambition to provide better walking and cycling infrastructure, but are limited by our resources. It is our intention to provide the DfT with a delivery plan for key walking and cycling infrastructure both within and linking to National Parks, that will enable National Parks to enhance their offer as the best places for walking and cycling in England. Delivery is dependent on the provision of cross-Department funding, but can help achieve Government aspirations across the economy, tourism, for transport road safety, public health and sport. We note that the recently published *Towards an Active Nation Strategy 2016-2021* by Sport England makes specific reference to the organisation funding "wider forms of walking for leisure". This is welcome and in order to maximise effectiveness of such funding commitments it is important that initiatives that Sport England undertake are inter-linked with those that DfT can fund through the Cycling and Walking Investment Strategy.

Question 3: The Government would be interested to hear suggestions and evidence of innovative projects and programmes which could be developed to deliver the objectives outlined in Section 4

34. The network of National Park Authorities have a range of projects and programmes that are delivering infrastructure on the ground and engaging infrequently or potentially returning cyclists. A few examples are provided below.

Cycle Friendly Places – The Pedal Peak II Project incorporated a Cycle Friendly Places Grant element. This was administered by the Peak District National Park Authority and was open to businesses and community groups. The idea behind the project was to encourage applicants to provide facilities for cyclists to encourage visits by cyclists and to bring economic benefit. The projects were mainly linked to areas where other investment had taken place. Overall, 29 small-medium scale projects were delivered with each applicant bringing more than 30% of the project value in match or in-kind funding. Feedback has indicated that in most cases visits by cyclists have increased and the businesses involved have benefited accordingly. The indication is that in some cases, these journeys would not have been made either at all, or by cycle.

South Downs: Cycle First, an LSTF revenue scheme took place across 4 locations in the South Downs National Park. The project engaged over 1,000 cyclist participants including – 869 Guided Ride participants, 102 workshop attendees (Maintenance and Cycle skills), 25 South Downs Cycle Ambassadors and 18 Ride Leaders trained. The scheme was successful in attracting the target audience of mainly infrequent and returning cyclists (80%).

Lake District: A New Look at Rights of Way – Given our concerns over the apparent urban bias in the CWIS, and the lack of any reference to the rights of way network, the Lake District National Park Authority believe this can be rectified by a fresh and innovative look at the rights of way network in England. The rights of way network has been the foundation for access outside of urban areas for 65 years now but is arguably not fit for modern day recreational needs. There are a number of reasons why this is a fantastic opportunity to work with interested partners to pilot bold ideas to better connect the network:

- The access element of the Land Reform Act in Scotland has worked well, although managed solutions are needed in some cases
<http://www.gov.scot/Resource/0045/00451087.pdf>
- The Welsh Assembly consultation into access reform has generated a huge positive response for a Scottish style system
- Outdoor recreation being included in the recent Sporting Future Strategy for the first time
- Governing bodies such as British Cycling and campaign groups such as Cycling UK are increasingly calling for better off-road cycle access
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The Lake District NPA therefore wants to work with the DfT, Defra, Sport England and local partners in Cumbria to explore and pilot options to better connect the rights of way network.

Question 4: The Government would be interested to hear your views on how to increase cycling and walking in typically under-represented groups (for example women, older people, or those from black, Asian or minority ethnic backgrounds)

35. We believe that National Parks have a key role to play in this; National Parks offer spectacular landscapes in which to experience walking and cycling in a safe environment. For new and returning walkers and particularly cyclists, this is important, as fears about safety are a major reason why many individuals do not participate in these activities. National Park Authorities already undertake work to encourage visits from under-represented groups and are therefore in a good position to deliver on this element of the Strategy.

36. For example, National Parks have had experience of working on projects such as ‘Mosaic’ that encourage people from BAME communities to access and enjoy the fabulous recreational opportunities that exist. The South Downs National Park has worked with a specific group of BAME people in East Sussex to train them to become walk leaders and they are now leading walks for their friends and family, thus increasing participation. This model has proven to be particularly effective for promoting behaviour change and would be equally applicable to cycling.

http://southdownsforum.ning.com/forum/topics/enjoying-the-sun-on-a-cold-day?xq_source=msg_mes_network

37. The National Parks also have been rolling out ‘Miles Without Stiles’ programmes to provide a range of accessible routes. These help open up the possibilities for those with physical disabilities, but also benefit many people in society who might experience some form of restriction in their physical activity, such as older people or those managing long term health conditions. The Miles Without Stiles programme supplements the more challenging routes that are also available in National Parks.

38. Such programmes also support the Department for Environment, Food and Rural Affairs' 8-Point Plan for National Parks' ambitions to '*encourage more diverse visitors to National Parks*' and to '*realise the immense potential for outdoor recreation in National Parks*'.

Question 5: The Government would be interested to hear views on what type of assistance Local Authorities and Local Enterprise Partnerships would find beneficial to support development of ambitious and high standard Local Cycling and Walking Infrastructure Plans

39. It is difficult to be too specific in this respect, as the individual plans will vary according to the scale of area and potentially the local government boundaries covered by the Plans. As these documents will invariably be used as bidding documents for future funding, it would be useful for the Government to provide examples of good practice – i.e. those Plans that have been successful in securing funding.

40. Bringing forward documents of this nature can be very time-consuming and resource intensive, if sufficient time is to be taken to consult local residents and interest groups. This is particularly important where infrastructure is planned away from the highway and beyond the scope of permitted development. Advice from government with regard to their expectations for the scope of consultation required might prove useful.

41. Making the economic case for walking and cycling infrastructure schemes can be problematic. The availability and promotion of standard tools to assess the economic benefits of walking and cycling schemes would be beneficial for those developing Infrastructure Plans. These could build on, for example the NICE Guidelines for Walking and Cycling.

42. Emphasis is given on developing Strategies and Plans. Whilst NPE recognises this is needed to provide focus and ensure projects can deliver a range of ambitions; they do also need resourcing. It is important to be able to identify funding for delivery and we believe continuation of Government funding for such programmes is vital if they are to be genuinely delivered on the ground.

43. In addition, we believe that Local Enterprise Partnerships would benefit from clear instruction from the Government that National Parks are eligible for Growth Funding for infrastructure schemes where they can demonstrate that their proposals contribute to delivery of Government's Ambition. We would also suggest that the LEPs responsibility with Growth Fund extends to economic growth through tourism, and that clarification to this effect could usefully be provided.

Conclusions

44. National Parks England fully supports the Government's aims for walking and cycling and wishes to be involved in the delivery of these aims. We see strong synergies between the DfT's Walking and Cycling Infrastructure Plan and Defra's 8-Point Plan for National Parks. They complement each other and National Parks have a vital role to play in delivering the Governments aims for walking and cycling.

45. However, the current format of the Infrastructure Plan is very urban focussed, and whilst there is a funding commitment towards the Plan, in reality, very little of this funding remains uncommitted. The tone of the document is very much urban based and fails to address, in particular, the investment needed to improve the recreation offer to the country or its contribution to the rural economy. Though we hope we are wrong, we observe little appetite for any revenue funding to put programmes in place to get people to alter their habits.

46. In order for National Park Authorities to play a role in the delivery of the Plan, they will need to be able to compete for this funding. In some National Parks, the complex nature of their geography (crossing multiple highway authority and Local Economic Partnership boundaries) means that without changes to the draft, it is likely that these hubs of the rural economy may miss the opportunity for investment. Therefore, National Park Authorities need to be able to access funding directly, or through their constituent authorities, and Local Economic Partnerships will need to be reminded by Government of the need to make funding available in National Parks.