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Draft response to the current draft "guidance" which proposes to exempt most of Wales from the more useful parts of the Active Travel Act. As responses have to be in by the 28th of this month, please let me know as soon as possible if any changes may be needed. I hope that the following is suitable:

Welsh Government

Consultation on where the Active Travel (Wales) Act 2013 will apply within Wales

The Active Travel Act requires Councils to produce and publish maps and to make year on year improvements to infrastructure. We comment on the proposal to limit these provisions to particular areas of Wales

The current draft guidance will make the most effective provisions of the Act apply only to specified 'large communities'. For this purpose, the map of Wales has been divided into 50 metre squares, and these squares categorized into built-up or not. Adjacent built-up squares have then been aggregated into 'large communities' with over 2,000 inhabitants. The resulting maps present a "tight" definition of areas with high population density. (They have also, generally, identified areas with concentrations of daily destinations such as shops and employment.) In many areas of Wales, most of the population does not live in these 'large communities', but rather in large villages, almost all within easy cycling distance of towns.

Outside large conurbations, most demand for utility cycling in Wales is, and will continue to be, from the areas not within, but *within reasonable cycling distance* of these 'large communities'. Easy cycling distance is not limited to a 50 metre radius. 9 miles would be a more appropriate approximation to maximum reasonable cycling distance. The present draft guidance is thus a proposal to remove from the main scope of the Act many of the areas in which it may be most usefully employed.

It may be said that restricting the areas that the maps will need to cover will make the work of mapping good facilities less onerous upon Councils. This is a trivial issue, since good-quality facilities for active daily travel, outside the 'large communities', are at present extremely rare throughout Wales. If it is felt essential to exempt areas from provisions of the Act, the guidance should exempt only areas that are not within easy cycling distance, nine miles or more, of the 'large communities'.

Our preferred solution is to rephrase the guidance so that the 'large communities' are suggested as initial foci for attention, so making full use of the mapping work so far. No areas should be exempted from any requirements of the Act.