

THE CUMBRIA COUNTRYSIDE ACCESS PARTNERSHIP BOARD
{the partnership between Cumbria County Council and the Cumbria Local Access Forum}

Outdoors for All?
A response to DEFRA's Consultation Document/Draft Diversity Action Plan

Introduction

1: In Cumbria three guiding principles have been adopted:-

We are in favour of access as far as it is legally provided for and practicably sensible to provide it;

We believe that access should be available (within the bounds of reasonableness) to all existing and potential future users; and

We believe that access should be exercised in an informed and responsible manner.

2: These guidelines, which incorporate a principled approach to diversity, have guided the LAF, the County Council, and the Partnership Board, in all their subsequent work. In particular, the County Council's *Countryside Access Strategy* (produced jointly with the two National Park Authorities operating in Cumbria) sets out a clear strategic approach to a range of diversity issues: and the County Council's draft *Rights of Way Improvement Plan* already goes into more detail on such matters as 'Opportunities for people with limited mobility'.

3: It is against this background that the Partnership Board submits its response to DEFRA's consultation document.

The Document as a Whole

4: The draft action plan is high on aspiration, and the Board can unreservedly support most of those aspirations. But it is also high on generalisations, excessively wordy, rich in current Governmental jargon, and poor on specifics. For this reason, the Board is critical of much of the detail in the document.

5: DEFRA, and Government more widely, must realise that if the praiseworthy objectives of the draft plan are ever to be put into practice, there must be a consistent and coherent approach to the interlocking complexities of all the issues involved.

6: Two examples of the Government's failure to approach matters in this way will suffice:-

- (i) Recent approaches by Government to rural transport issues – well intentioned, but which were clearly not properly thought through – have already resulted in a situation in which, in many of the rural areas of Cumbria, access to transport options for some disadvantaged groups have already been *decreased*, rather than the reverse.
- (ii) The Government's overall approach to young people's safety and welfare, compounded in many local communities by the perception of a Government backed attitude to "health & safety", has already had the effect of killing off virtually all school based trips into the

outdoors (many of which used routinely to take place in connection with the geography, history, and natural science elements of the curriculum). Appropriate opportunities for young people are, over time, at the heart of achieving any success in this area of work.

7: These issues, like many other real problems, are admittedly complex, but we expect Government to think them through, and then to act logically. Reducing rural transport opportunities, and effectively stopping outdoor experiences for most school pupils, are *not* consistent with an action plan aimed at *Outdoors for All*.

8: At the same time, any action plan will require appropriate levels of funding. The consultation document touches on this in §2.6 and in Annex 3, but it is not clear whether the amounts there indicated are either (a) actually available, or (b) genuinely new money. Without an appropriate financial commitment by the Government, relatively little new will happen.

9: In very general terms, the Board believes that the right way to address the challenges identified by the consultation document is through a series of properly funded *specific* action programmes – which might focus in Cumbria on relevant target groups in the more disadvantaged areas on the west of the County (and nationally on such groups in our inner city areas). Only specific actions, locally determined and managed, will – over time - affect the situation in a sustainable way.

10: At a different level, it is also necessary to comment briefly on the drafting of the document itself:-

- (a) The language of the document is inappropriate – for example, people are referred to as “customers”, as if they are necessarily in some sort of client/purchasing relationship. The least inappropriate word in context would probably have been “participants”. More broadly, the language (*e.g.* use of the term “carers”) does not take account of the advice in the recent publication “*By all reasonable means.*”
- (b) The document is considered to be rather long-winded and repetitive and could have been condensed into half its size by reducing jargon *e.g.* ‘cross-cutting government agendas’, ‘smart sharing’ etc. The annexes and action plan should have been at the front of the document as in places they were more useful than the rest of the text.
- (c) There is no reference on the face of the document, as to whether it, or a summary of its contents, is available in alternative formats or languages. Given its purpose, this can hardly be described as the right example to set!

The Specific Questions

11: We turn now to the specific questions highlighted in the consultation document:-

Q1 Is this a vision that your organisation can subscribe to? How can you help us achieve it?

Yes, this is a vision about an inclusive outdoors and giving under-represented users the chance to make informed choices. We are already working towards this end, and hope to develop the sorts of resources outlined in the document (*e.g.* on page 21). It is recognised (on page 42!) that central Government must take the lead for this agenda. This commitment should have been on the first page of the document.

Q2 Are these outcomes realistic and are any missing?

Broadly speaking, yes and no – but see earlier comments about language. However, the research for the ROWIP highlighted the fact that transport is so often a key issue for under-represented groups. This outcome should be the first one in the list, rather than the last – to further stress the integration needed - as transport is critical to a countryside visit taking place at all even if the other outcomes are in place. It is very likely that a barrier for inner-city young people is the lack of school trips (and the reluctance of teachers to take responsibility because of the “blame culture” / lack of training). DEFRA should consider as a matter of some priority how to overcome this obstacle.

Q3 Are these objectives ones which your organisation can subscribe to and help deliver?

Yes - but see earlier comments about language. Specifically, caution must be expressed about the idea that is apparently inherent in the first objective – embedding principles into the planning and practice of ‘providers’ achieves nothing if they are not working with & understanding the needs & aspirations of potential participants! The real results will come from getting networks of *people* to subscribe to these agendas, working together to access resources. It should be noted that ROWIPs already include a core assessment of the accessibility of local rights of way to people with mobility impairments. Each local authority could be encouraged to include wider diversity improvement measures in ROWIP action plans when they are reviewed in 2010-11. The approach in Cumbria is to focus initially on improving provision for people with limited mobility (ROWIP research identified a number of critical needs that are not being met) and providing accessible information, before considering the needs of other under-represented target groups. It is felt that *the provision of facilitated visits* is not a sustainable activity.

Q4 Are these targets realistic and ones that your organisation is able to work towards, with others, to achieve?

Yes – but (see above) Government will have to change its approach to help us achieve them.

Q5 We do not think that a quantified national target for the increase in under-represented groups is appropriate. Do you agree? Should individual service providers set targets? If you are a service provider, what level of increase do you think it would be feasible to achieve?

Yes. If a *specific* programme is involved, it would be entirely reasonable for it to work towards quantifiable targets, but note that there could be a significant difference between a measurable increase in *awareness* and a measurable increase in *participation*. The approach taken to targets through the Local Transport Plan process should be adopted for ROWIPs.

Q6 Do you think that the milestones are realistic and the timescales for change appropriate?

Probably not. Milestones are a very ‘top down’/‘one size fits all’ approach. Requiring fixed interval reviews of local progress on specific programmes, similar to the LTP annual progress reports, is likely to be more productive. Note also that we very much doubt the need for yet more research (see page 11) – if anything is to be done, now is the time for specific action, rather than yet more time actually doing nothing!

Q7 What would be the best mechanism for keeping you up to date as the plan is implemented and reviewed?

Simple ‘one side of A4’ briefings (electronic & paper versions in multiple languages/formats), say twice a year.

Q8 Do you agree with these priorities for guidance and training?

No. The call for (yet) more training & research is too often an automatic response to a challenge – which itself may well not be a new one! There is plenty of research out there, such as that done for ROWIPs, and it may only need drawing together. In the broadest terms, we reject the implied need for a general training programme (although we accept that local ‘informing events’ will be very valuable). In our view, there is plenty of knowledge and experience already available – what is needed is to harness it to specific action programmes.

Q9 & Q10 Do you have a preference for how these are delivered? Can we link this work to existing training or guidance in this area?

We consider that two kinds of meetings are particularly valuable. The first is a local, relatively informal, exchange, bringing recreation providers, land owners, managers & users, local businesses etc *in contact* with the target audiences, enabling an exchange of understanding on both sides, a chance to observe and possibly experience barriers to participation, and a chance to network with others. We believe that this sort of meeting must be repeated over time as new staff or volunteers or members (of the Local Access Forum for example) need to be involved. The second kind of meeting is a ‘round table’ management & implementation group engaged in putting an agreed approach into practice on the ground. We have already found this second approach invaluable. If some national standard could be established about understanding and embracing the needs of under-represented people in the countryside, then it would add strength and weight to the programme as well as transferability of skills (perhaps IPROW or other existing training providers would be able to assist, through Sheffield Hallam University?)

In addition, synergy on guidance / training delivery must be achieved locally with partners such as the National Trust, AONBs & National Parks, Woodland Trust, YHA etc.

This whole area of work would require a great deal of coordination, both nationally and locally, and this aspect should not be overlooked by DEFRA. The fact that the training programme is proposed to be nationally funded is welcome.

Q11 Are there any further activities that would help embed diversity and equality principles?

We think that this is the wrong question, just as §2.2.1 emphasises the wrong activities. “Embedding” principles in key documentation may be worthwhile, but it actually delivers nothing at all on the ground!

However the board has a number of ideas regarding improvements that could be made as follows:-

- Existing national guidance such as ‘*By All Reasonable Means*’ (referred to on page 18) has had a mixed reception. There would be some merit in combining this national guidance with similar documents for the other target audiences.
- Current strategies need to be refreshed using Equality Impact Assessments, using input from community groups.
- Diversity and Equality principles could be embedded further in local plans and local development frameworks and national guidance *e.g.* the revision of PPGN 17 / ODPM circulars. Each highways authority could be required to have a policy on access to the countryside by the target audiences.
- Existing gaps in Cumbrian strategies have already been screened by the County Council’s Equalities Officer.
- The BVPI 178 could be amended to include measurements such as:
 - Provision of accessible information on countryside access on a website in variety of formats available
 - Survey elements to include an assessment of a route’s accessibility
 - Other BVPIs might measure the accessibility of public transport
- Insisting in Environmental Stewardship applications that the highest level of accessible path furniture is standard. For example, stiles *should simply not be funded* under HLS schemes, *they should not be an option.*

- The British Standard for gaps, gates and stiles is not enforceable and could be strengthened.
- The broadening of the definition of the ROWIP assessments to include all of the under-represented target groups.
- As ROWIPs and LTPs are to be integrated by the 2010-11 cycle, perhaps new guidance should be issued that covers the integration process as well as accounting for the Diversity agenda?

Q12 Is it practical for existing forums to assist and develop the diversity agenda? Which ones to you consider to be potentially the most effective?

In principle, yes but in practice this would be very difficult and the existing mechanisms for conversations with diversity stakeholders should be used. We are acutely conscious that bodies such as Local Access Forums are very variable in their effectiveness and, indeed, in the strengths and experiences of their volunteer members. There is also a real challenge in securing the services on such forums of articulate members of potential target groups. This problem is of course by no means confined to LAFs and similar bodies. For example, despite the work of the National Youth Agency (*Hear By Right*) and others, securing a real voice for young people is exceptionally difficult: and, at least in Cumbria, to find a representative voice of the BME community would be virtually impossible.

Q13 Are new types of forum needed, at what level should they be created and how would they work?

No. In general terms, any new forums created for this purpose would almost certainly be seen as ‘single issue voices’, and fail to command adequate respect or resources. Work should be concentrated through existing statutory bodies and forums which already have relevant responsibilities.

Q14 & Q15 What other types of information might target groups find helpful? Are there other formats in which it could be presented? What assistance or guidance would your organisation need to develop or improve its own marketing information to under-represented groups?

We are uncertain about these questions, but inclined to two views – first, that we should ask our own target groups what kind of information *they* would find most appropriate, helpful, and accessible: and second, that – especially in respect of young people – their answers are likely to change relatively quickly over time, and that we need to find effective ways of responding to those changes. Cumbria County council is committed to making documents available in alternative formats when requested. Research has taken place into the linguistic groups in Cumbria and the translation service is advertised in these languages.

Websites are a useful tool to reaching groups such as people with limited mobility, as long as the information is up-to-date: but it should not be overlooked that some of the target groups rely heavily on ‘word of mouth’ based on personal experience as an information source so the use of formal and informal networks is to be encouraged.

A national promotional campaign ‘underpinned’ by local delivery is a concern. Some local delivery, such as accessible transport, dissemination of physical barrier information on routes, working with local business to raise awareness of challenging the ‘not welcoming’ barrier are priorities, *before* any promotional campaign. The alternative will lead to frustration and cynicism from the target audiences.

Cumbria County Council would seek to develop marketing information in partnership with other bodies, such as the National Parks, AONBs, Cumbria Tourist Board etc. Assistance and guidance might be provided in terms of:

- What formats are requested by user-groups (some national monitoring);
- Advice / best practice on how to meet requirements (e.g. providers of translation services, spoken word or Braille printers, subtitles etc);
- Guidelines for printers / video producers / web designers on the highest level of accessibility information, including examples (e.g. spoken narratives for visually-impaired people integrated on a DVD with subtitles for deaf people, alternative languages etc etc); and
- help / advice for access professionals in how to communicate these requirements with printers / video producers / web designers etc.

Q16 Do you agree that there is a need to improve the baseline data on participation in outdoor recreation?

In principle, yes. However, there is already considerable evidence (in Governmental terms, in the hands of DfES and HSE) that measuring participation in the most simple outdoor activities (*e.g.* a walk in the park) is very difficult. It may not be worth the expense, especially when the resources required could alternatively be spent on specific local action programmes with measurable outcomes. Amendment of the England Day Visits survey to help collect information about countryside visits by the target audiences should be considered.

Q17 Does your organisation collect data on visitors and/or the awareness of provision by under-represented groups? If So, in what form?

No. The County Council funds Cumbria Tourism which provides intelligence on visitors.

Q18 Should the Action Plan be extended to cover carers for the elderly and children and young people in the inner cities?

The point of this question is not clear. If the possible intent is to target care assistants/carers *in their own right*, we do not quite see the point. If, however, the intention is to target them *as a channel* to the target groups of the young and the elderly, then, alongside other approaches, yes.

Q19 What should the priorities for any further research be?

None – see above. Research should be locally based to support the ROWIP. It appears (page 30) that Natural England are proposing to carry out a sample survey of employee and volunteer profiles. It is suggested that this is not a priority.

Q20 & Q21 Which existing funding programmes do you consider to be the most relevant for helping deliver the diversity agenda? What should the priorities be for spending in this area?

In our view, the need is for properly funded *specific* action programmes. In an ideal world, these could be separated from other work – but since our considered view is that primary responsibility for the delivery of such programmes should be placed on existing statutory bodies which already have relevant responsibilities, they will in practice best be run as part of a properly planned overall programme. Accordingly, the necessary funding should also follow that route. In our experience, the model of the Access Management Grants Scheme has much to commend it, as being both flexible and capable of encompassing varying priorities. Subject to overall national terms of reference (*e.g.* the identification of broad objectives and target groups), priorities should be determined locally.

Q22 & Q23 Does your organisation have specific targets for diversity and do they cover access to outdoor recreation as a service? Where would the introduction of new diversity targets make most impact?

The County Council already has a limited number of specific diversity targets, most notably in the draft *Rights of Way Improvement Plan*, which include:-

- Having a more pro-active barrier-reduction approach on public rights of way in partnership with land managers;
- Providing comprehensive information about conditions and facilities on routes in a variety of formats;
- Integrating countryside access with public transport (provide self-guided or organised walks from easily accessible locations or from public transport);
- Promoting access to the countryside via public transport and link with walking and cycling routes;
- Responding to requests for information in other formats (making promotional material accessible to all users);
- Targeting guided walks and information at under-represented groups;
- Integrating 'Walking the Way to Health' initiatives with guided walks and a barrier-reduction approach (targeted at areas of multiple deprivation); and
- Providing outreach to schools and community groups to raise awareness of opportunities, rights and responsibilities, health benefits etc.

New (generalised) targets would have most effect in supporting work to change attitudes – provided always that genuinely additional resources were made available to support delivery on the ground. Note that in particular we do *not* support the extension of the Green Flag scheme for a number of reasons, but most significantly because in our view it runs the risk of “ghetto-ising” the work that needs to be done.

Q24 Are champions needed?

There are arguments for and against ‘champions’ (*e.g.* that the identification of a champion removes the need for *everyone* to accept responsibility), so that unless the role is undertaken by a very senior politician or officer we are unsure of its value

Q25 Does your organisation have a diversity champion that we could keep in touch with during the delivery of this plan? If not, are there any barriers to identifying such a person for us to work with?

In the case of our own work, contact should be made with either or both of:-

- The Countryside Access Development Officer, 01228 601022
- The Countryside Access Partnership Officer, 01228 601064

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