

# Llwybr Newydd: a new Wales transport strategy

## Q1. Do you agree with our long-term vision?

Agree

### Comments:

The focus on a sustainable transport hierarchy is a positive one as is the alignment with the WFG Goals. The pandemic, whilst a relatively short term event, has shown what can be achieved in terms of behavioural change (eg commuting), but also how quickly behaviours can revert if infrastructure is not provided/remodeled to support change.

The pace of change and the shift towards the proposed transport hierarchy will need to be accompanied with a very detailed transition plan including investment proposals. Infrastructure proposals need to be in place before any restrictions are applied to current modes of transport otherwise people will be disadvantaged before other options are in place. This could be particularly difficult for those in rural areas.

Future land use decisions will be critical to the success of any transport strategy. Is the "Planning and Development Control" process fit for purpose to support this? Is it sufficiently integrated and well coordinated, nationally, regionally and locally to "join up" land use and transportation decisions. Do we need a "mini plan" for land use to sit alongside the mini plans for transport modes? This is a significant area of concern.

The strategy needs to recognise the importance and value of our current transport assets - roads in particular. Whilst the transport hierarchy puts private car use at the bottom this remains, for the foreseeable future, an important means of transport for many, especially in rural areas. This mode of transport must not be "demonised". And neither must the construction of new roads which have important roles to play in reducing carbon emissions, improving air quality and supporting active and healthy lives. In fact the maintenance of our road assets should be viewed as an area requiring significant investment to protect and make safe our highway routes for all users (especially cyclists and walkers).

For a long term strategy like this to be successful, and particularly in the context of the WFG Act, investment must shift from annual programmes to multi-year programmes (at least 3-yrs but preferably 5-yrs if it is to meet the 5 year priorities set out in the strategy).

Overall the strategy seems to be quite "light" when it comes to discussing freight movements and long distance "international" movement of goods and people. This needs to be far more strongly addressed for the strategy to be considered "credible".

Attention to the needs of people with disabilities (particularly when it comes to active travel modes, especially cycling) seems very light as do opportunities for the third sector to support active travel opportunities.

## Q2. Do you agree with our 20 year ambitions?

Agree

### Comments:

The strategy sets out how the WFG Goals will be met which is very helpful for stakeholders to understand and respond to. The overall ambitions are laudable and difficult to disagree with in the context of climate change, health outcomes, etc. However, the ambitions feel more focused on urban than rural areas which could lead to greater inequality and disillusion.

### Q3A. Do you agree with our 5 year priorities?

Agree

**Comments:**

The 5-year priorities are supported overall. However, there is a lack of focus on how the road network will/should deal with freight and "international" travel. Transport is not just about the movement of people it is very much about the movement of goods which the priorities fail to adequately reflect. There should not be an expectation that freight will be moved largely by rail. The road network is essential in moving freight (rail capacity and coverage is simply not there - and unlikely to be there for the whole of Wales). This needs to be recognised by the strategy. Also, the suggestion that opportunities for shared/optimised freight transport seems over optimistic.

The focus on local/urban travel movements is partially understandable but a lack of attention to rural travel will exacerbate inequality.

For a long term strategy like this to be successful, and particularly in the context of the WFG Act, investment must shift from annual programmes to multi-year programmes (at least 3-yrs but preferably 5-yrs if it is to meet the 5 year priorities set out in the strategy.

Overall the priorities seems to be quite "light" when it comes to discussing freight movements and long distance "international" movement of goods and people. This needs to be far more strongly addressed for the strategy to be considered "credible".

For these priorities to be successfully delivered, and particularly in the context of the WFG Act, investment must shift from annual programmes to multi-year programmes (at least 3-yrs but preferably 5-yrs if it is to align with the 5 year priorities set out in the strategy.

Q3B: Do you think that we have the right number of priorities or should these be further refined? If so, do you agree with the following 3 priorities: 1. We will reduce the need to travel. 2. We will encourage modal shift - when people need to travel we will encourage them to take fewer car journeys and use sustainable forms instead through supply of better services, and stimulating demand for them through behaviour change measures. 3. We will adapt out infrastructure to meet the challenge of climate change, and ensure our transport system is well-maintained, safe and accessible.

Neither agree nor disagree

**Comments:**

Whilst these 3 priorities are laudable they fail to recognise the needs of non-urban travellers. Also transport is not just about the movement of people it is very much about the movement of goods which the priorities fail to adequately reflect. There should not be an expectation that freight will be moved largely by rail. The road network is essential in moving freight (rail capacity and coverage is simply not there - and unlikely to be there for the whole of Wales). This needs to be recognised by the strategy. Also, the suggestion that opportunities for shared/optimised freight transport seems over optimistic.

I would stick with 5 priority areas but give more focus to the needs of rural communities in all 5.

Q4. We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

Yes

**Can you suggest others?**

Overall the measures seem pretty good. However, measures relating to business impacts and, specifically, the movement of goods (by travel mode) need to be expanded. Plus greater focus needs to be placed on the benefits of increased active travel (health, wellbeing, etc) and how disabled people are able to benefit more from the investments.

Q5. Do you think we should include specific targets for more people to travel by sustainable transport?

Yes

**Do you have any suggestions for how we should do this?**

As this is such an important part of the strategy it is essential for targets to be developed. These should be specified separately for different transport modes. It could be by numbers of people or volume of freight, distance travelled or time spent. Unless there are international comparisons in this area it may be more helpful to initially set modest targets and then year on year improvements.

Q6. We have identified a set of actions to deliver the draft strategy. Are they the right actions?

Yes

**Are there others that you can suggest?**

Third sector need to be actively engaged in delivery (and policy/programme development) particularly focusing on the needs of disabled people (especially in active travel).

Private sector businesses need to be able to shape decision making (especially delivery of the mini plans).

Local businesses need to benefit from investments in both infrastructure delivery and the provision of transport services (eg community buses). Social value has to underpin delivery of the strategy.

Q7. We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these?

Yes

**Do you have any comments on these?**

As stated above the minimal focus on freight/goods movements needs to be addressed more strongly in some of the mini plans as does the requirements of rural Wales. This is particularly true for the "Roads" mini plan. Roads will remain a significant carrier of freight yet references to this in the mini plan are extremely light. This needs to be rectified.

I would also add that there needs to be a mini delivery plan for land use management. Whilst not a mode of transport it will impact on the success of the strategy as much as anything. This seems to be a potential weak link in the strategy given the complexity of planning processes and the lack of alignment, coordination and integration of national, regional and local planning decisions.

Q8. We have shown how transport will use the 5 ways of working set out in the Well-being of Future Generations (Wales) Act 2015. Do you agree with this approach?

Yes

**Do you have any comments?**

It is important the 5-ways of working are understood and applied but for these to have real impacts these ways of working must be applied throughout the implementation stage eg when actions are implemented through private sector suppliers these same ways of working must be applied through procurement processes into actual delivery on the ground. This could be for construction companies delivering infrastructure works or transport providers delivering services to customers.

Q9. If charges for road use were to be introduced to help meet goals for cleaner air, a safe climate and better health, how can this be done in a way that's fair to everyone?

Road charges should be linked to the economic value of any journeys as well as environmental and social aspects. This would include freight movement. Could distinctions be made for "international" movements to/from Ireland? Could freight be charged less/more than commuter/tourist traffic? If other measures are successful then the volume of local traffic should be much less anyway.

## Integrated Sustainability Appraisal

Q10A. Do you think the Integrated Sustainability Appraisal report identifies the most important sustainability effects for transport?

Yes

**Comments:**

Overall it is positive. However, it needs to be strengthened in terms of addressing:

- a. limited references to specific rural connectivity issues
- b. limited regards to the movement of freight and the associated economic benefits
- c. potential/significant difficulties in developing specific land use parcels to support integrated transport aspirations
- d. how disabled groups can practically benefit from active travel opportunities

Q10B. Are there any gaps?

Yes

**Comments:**

Overall the assessment is positive and responds to the challenges that we face in Wales. However, it needs to be strengthened in terms of addressing:

- a. limited references to specific rural connectivity issues
- b. limited regards to the movement of freight and the associated economic benefits - both within Wales and beyond (given that some of our routes are of UK and European significance)
- c. potential/significant difficulties in developing specific land use parcels to support integrated transport aspirations - there needs to be greater confidence in how this would work given its importance to the overall success of the strategy.
- d. the references to the NDF need to be much clearer and explained in very simple terms how this will work practically.
- e. how disabled groups can practically benefit from active travel opportunities - there are significant barriers to this happening and the strategy fails to adequately reflect these.

Q10C: Do you have any comments on the findings of the report?

These are included above.

## Impact on Welsh Language

Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011. We would like to know your views on the effects that the draft Strategy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The strategy remains too focused on urban areas and has limited regards to rural areas. The sustainable transport hierarchy, whilst laudable and supportive of transport development in urban areas, may create/perpetuate inequalities in rural areas with many of those supporting Welsh language communities. This needs to be addressed with, if necessary, specific plans/references for more isolate and rural communities. The current draft of the strategy gives limited regard to the specific and real concerns of citizens in these areas. If this does not happen it is likely to be poorly received in Welsh language/rural communities.

Question B: Please also explain how you believe the draft Strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As above, the strategy remains too focused on urban areas and has limited regards to rural areas. The sustainable transport hierarchy, whilst laudable and supportive of transport development in urban areas, may create/perpetuate inequalities in rural areas with many of those supporting Welsh language communities. This needs to be addressed with, if necessary, specific plans/references for more isolated and rural communities. The current draft of the strategy gives limited regard to the specific and real concerns of citizens in these areas. If this does not happen it is likely to be poorly received in Welsh language/rural communities.

## Impact on people who share protected characteristics

Question C: Do you think this draft strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important?

Yes, as long as those who share protected characteristics remain actively involved in the development and delivery of the strategy, particularly the mini plans.

Question D: Do you think the draft Wales transport strategy could have a negative impact on some people or groups who share protected characteristics? If so, what are they and how can we prevent those?

No, as long as those who share protected characteristics remain actively involved in the development and delivery of the strategy, particularly the mini plans. Those developing the strategy and plans should publish clear statements on how they intend to involve stakeholders, especially those who are difficult to reach eg no access to "virtual" technologies.  
Also see references to Welsh language and rural communities.

## Further comments

Question E: Are there any further comments that you would like to make on Llwybr Newydd – a new Wales transport strategy?

These comments are more of a summary.

Overall the strategy is positive and responds to the challenges that we face in Wales. However, it needs to be strengthened in terms of addressing:

- a. limited references to specific rural connectivity issues
- b. limited regards to the movement of freight and the associated economic benefits - both within Wales and beyond (given that some of our routes are of UK and European significance)
- c. potential/significant difficulties in developing specific land use parcels to support integrated transport aspirations - there needs to be greater confidence in how this would work given its importance to the overall success of the strategy
- d. how disabled groups can practically benefit from active travel opportunities - there are significant barriers to this happening and the strategy fails to adequately reflect these.

## Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending. Name

Ed Evans

If you want to receive a receipt of your response, please provide an email address. Email address

ed.evans@cecawales.co.uk