

Consultation Response Form

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Q1: Do you agree with our long-term vision?

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know
No opinion

Please provide your comments:

We are supportive of the vision but feel it is important to stress that 'accessible' should recognise the often-varying needs of rural and urban populations, and that for some, access to the road network will remain crucial where public transport or active travel are not practicable options.

It may be useful to add something like 'attractive', to reflect the intention to increase usage of sustainable travel options and the need to attract people with little or no experience of using public transport.

Q2: Do you agree with our 20-year ambitions?

Strongly agree Agree Neither agree nor disagree
Disagree Strongly disagree Don't know
No opinion

Please provide your comments:

We are supportive of the 20-year ambitions and whilst it is encouraging to see such positive vision, these ambitions will require significant front-end investment to deliver. Whilst we wouldn't expect this strategy to provide significant detail on how the ambitions would be delivered, there should be detailed analysis of what the likely costs of delivering these ambitions would be. Without a realistic appraisal of costs, it is difficult to comment on whether the ambitions are realistic or not.

Many local authorities already struggle to maintain transport infrastructure in its current form, and whilst technology will clearly have a significant role in driving efficiency in the sector, significant human resources will also be required to maintain them, requiring new skills and training too.

To have confidence in 20-year ambitions and to reduce the potential for repetitions and wastage, a long-term funding programme is needed to match this, and budgets must include considerations of the revenue costs associated with maintaining transport infrastructure. Without longer-term funding commitments, it is difficult to see how such long-term ambitions can be set. In line with this, there should be a clearer, more considered view of what the planned long-term role of TfW is in the delivery of this strategy, and what the expected roles of local authorities and other stakeholders are. This needs to be developed in a truly collaborative way, drawing on the respective skills, knowledge, and resources that each stakeholder brings.

The transport hierarchy recognises the need to overhaul the priorities for transport investment, but it must also be recognised that rural and urban authorities face very different challenges when considering a sustainable transport system, and that what is right for one authority may not be right for another. In rural authorities for example, without significant investment in rail and bus services, it is not feasible for people to use active travel (AT) or public transport. It may therefore be more appropriate to invest in electric vehicle charging infrastructure in these communities than active travel routes in recognition that sustainable transport is only sustainable if people use it. Whilst behaviour change will go some way to shifting people towards AT, for those with disabilities or those who live in remote locations, AT may never be a realistic option, and any strategy should be honest about this. There should also be recognition that some degree of road improvement will be required to improve bus services and cater for AT where designated routes are not an option. Without this, there are concerns that inequalities in rural-urban infrastructure investment will be exacerbated, with a

subsequent impact on rural economic development and social isolation. In this respect, a differentiated approach to transport investment across Wales must be taken, recognising that a significant proportion of Wales' population live in rural areas. There may also need to make a greater distinction between cars and motorcycles and electric scooters within the ultra-low emissions/other private motor vehicles layers of the hierarchy, with motorcycles and e-scooters potentially playing a significant role in low-cost, low-carbon transport.

If, as predicted, current trends continue, there will be a significant reduction in journeys to work being made across Wales. Transport policy and delivery programmes need to take account of this and include maintenance as well as improvements and expansion of infrastructure, including the resilience of the road network to support public transport, freight, and access to services, recognising that road improvements also have a role to play in decarbonisation. Reductions in travel will also have a clear impact on development and employment opportunities and the strategic siting of these, meaning strong collaboration with planning and regeneration partners at a national and regional level are required when considering investment.

As a general point, the overall layout and numbering of the ambitions and priorities is not easy to read and might benefit from a summary or overview.

S1: A reference to the need for travel planning would be appropriate here, to target individuals, communities/residential developments and employment/employers, recognising the need for societal and behavioural change.

Further work needs to be done to undertake a realistic appraisal of what proportion of the population will use active travel. Whilst every effort should be made to improve AT infrastructure and remove barriers preventing people from using it, there must also be a recognition that this figure will always vary significantly in rural and urban areas, and investment should reflect this reality and be directed accordingly.

S2: Investment in AT must be coordinated carefully with those responsible for the delivery and maintenance of it, and training programmes should utilise the expertise and insight of those that already exist within LAs. Links between road safety and behaviour change campaigns, for example, should be coordinated to deliver on shared goals and avoid contradiction and wastage.

E1: The recent recommendations for Wales made by the UK Climate Change Committee (CCC) make a clear case for significant front-end investment and suggests that there would be a return on that investment in a matter of years. This

strategy should address the recommendations in that report and must ensure that it aligns with the specific recommendations relating to transport.

C2 & C3: This section would benefit from a link or reference to TfW's Placemaking agenda.

M9: The focus on affordability is welcome, however there is only specific mention of concessionary fares, rather than affordability across the board. The current concessionary fares structure does not necessarily target those on the lowest incomes, and a review of this could be considered to address this.

Q3A: Do you agree with our 5-year priorities?

Strongly agree Agree Neither agree nor disagree X
Disagree Strongly disagree Don't know
No opinion

Please provide your comments:

It is essential that Welsh Government provides funding to match the timescales. The current short cycle of funding stifles long-term investment and leads to wastage.

Priority 1: Should include identifying the strategic infrastructure necessary to achieve the vision and ambitions, and to provide a solid foundation to build upon. This needs to include the highway network (trunk and county roads) as well as public transport infrastructure.

More detail on how WG 'will collaborate with planning, health and education' (within WG and external to WG) as part of the implementation would be welcomed, highlighted by good and poor examples from the past to evidence lessons learnt. Schools and educational establishments should be specifically included within the commitment to 'locate new employment, services and leisure close to where people live, and to existing public transport routes', particularly in relation to the 21st Century Schools programme.

Consider engaging with other organisations to consider what adaptations/changes could be made to support this agenda (e.g. introduce flexible working, change of start/finish times for schools, alignment of GP/healthcare appointment systems etc.).

Priority 3: This would benefit from a further commitment to support public bodies to 'green' their fleets and introduce ULEV pool cars to help reduce the number and impact of business journeys.

A commitment to support local authorities with maintaining and operating county roads would be welcomed given the chronic underinvestment in the network and the rising maintenance backlog. This would complement WG's statutory responsibilities as a Highway Authority and present a more holistic approach.

With respect to the EV charging initiative, PPW specifies the requirement for EV charge points within non-residential development but not for residential development. PPW should be updated to also include such a requirement for new residential development. Further work to look at the harmonisation of concession agreements for public/commercial EV charging infrastructure would be welcomed, though this may be addressed in the EV charging strategy currently out for consultation..

The strategy makes no mention of branding and marketing of public transport infrastructure e.g. TfW/Metro and LA maintained; so that there is the appearance and promotion of a national network. If the proposal is that for one, single TfW brand, then all transport infrastructure will need to be changed to reflect this and will need to be coordinated. This also raises questions around the transfer of ownership of infrastructure, particularly on sites with joint land and asset ownership.

This would also complement the proposals to improve the quality and access to national public transport information.

Priority 3: The commitment to continuing to meet statutory responsibilities for maintaining roads should reference the need to a resilient road network to support freight and improved bus services.

Priority 4: While there is support for improving transport data, more detail is required about how this might be delivered and the roles and responsibilities for this.

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 three 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 our infrastructure to meet the challenge of climate change, and ensure our transport system is well-maintained, safe and accessible.

Please provide your comments:

The number of priorities should be based on a realistic (but still ambitious) assessment of what is deliverable within the first 5-year period of the new Wales Transport Strategy, and what is necessary to achieve the desired outcomes. The priorities should also relate to a realistic appraisal of the level of investment and resource available to support them. A better understanding of what the role of CJC's will be in further defining and regionalizing the priorities in this strategy, and how funding will be allocated to support them.

Whilst the ambitions for TfW are generally understood and supported, it is recognised that the organisation is still evolving and its capacity to deliver on such a large agenda (without developing an overreliance on external consultancy support) is already under significant pressure.

Similarly, the capacity of local authorities and Regional Transport Authorities to support this transport agenda must also be realistic.

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

Yes No

Can you suggest others?

Further detail on the specific data that might be collected, and the proposed targets is required before being able to give an informed opinion on the value of collecting it and producing targets, and any targets developed must be SMART. Most of the measures appear to capture what happens (i.e. trends) as opposed to progress towards specified goals.

It will be important for WG/TfW to involve its key partners and stakeholders with development of the National Travel survey to ensure the most appropriate and helpful data is collected. This will also be important for local authorities who are likely to be reliant on it to some degree for their own monitoring purposes (e.g. APRs for RTPs/LDPs/SDPs).

M1-M4: more information is required on latent/unmet demand and barriers to active and sustainable travel. This could be addressed in part through the National Travel Survey.

M5 & M6: there is no mention of AQMAs and tracking success with addressing them.

M7: could include the introduction of green energy and sustainable design in new infrastructure, which again needs clear links to planning.

M9-M13: there needs to be a more explicit link between transport and its role in a successful and thriving economy and impact on GVA. Ideally there should be a GVA related measure. Funding will need to be sought from other sources biased towards economic growth, and there needs to be sufficient evidence and data to support any business cases.

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

Yes No

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

Targets are necessary to develop a full understanding of what the transport strategy and objectives are trying to achieve and to recognise when they have been achieved. Any targets set in relation to sustainable travel need to be supported by adequate investment, with a clear link made between the investment and how it will help to achieve those targets. The roles and responsibilities for collecting data on progress against any targets needs to be made clear and support provided to facilitate this where necessary. This should be developed in discussion with CJCAs/RTAs because what is necessary and realistically achievable may vary from region to region. This should also be supported by engagement with major services /employers, such as the NHS, and the private sector.

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

Yes No

Are there others that you can suggest?

‘Transport Responsibilities in Wales’: under Active Travel within the table, local authorities could also have a role in delivering transport services. The same applies for ‘Roads, streets & parking’.

‘Investing sustainably’: the recognition that ongoing revenue support beyond the

current level is required is welcomed. In particular the issue of ownership, responsibility, operation and maintenance of new future infrastructure (e.g. interchanges) must be addressed before committing to delivery.

Asset management strategies: this should include liaison with organisations with adjacent assets where an effective interface is required for users and to explore options for shared services.

As part of reviewing transport grant schemes, a review of the application and administration process for grant funding with CJCAs/RTAs is recommended to streamline and simplify the process to reduce bureaucracy and improve programme management (in particular for multi-year project/scheme delivery).

Working across WG departments: it would be helpful to cite examples of successes and areas for improvement from past experience in policy and delivery to help inform improved decision making and partnership working.

Working in partnership: In this section there is no mention of the WLGA or CSS Wales. As well as the CJCAs and RTAs, they could offer a valuable resource for effective coordination, partnership working, collaboration, consultation and engagement. We would welcome regular meetings with WG to collaborate in the further development of this strategy and subsequent delivery plans.

Transport governance and policies: this should also consider governance across related policy areas such as planning (SDPs & LDPs) to improve alignment.

The strategy refers to the development of several supporting plans and strategies (e.g. road safety framework, logistics and freight plan for Wales, Welsh ports and maritime strategy for Wales, low carbon strategy and energy strategy for Cardiff airport etc.). It would be helpful to set out an overview diagram of these with indicative timelines for completion.

Building skills and capacity: the recognition that this is required not only within WG but also with partners and delivery organisations is welcomed. More detail on how this will be developed and the roles and responsibilities expected of the parties involved is required. This will be a key discussion point with CJCAs/RTAs. It should also include consideration of succession planning and an apprentice and graduates programme.

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

Yes No

Do you have any comments on these?

Whilst we are supportive of the mini plan approach, there is insufficient information to say yes or no. The categories and key issues within the mini plans are appropriate but provide a broad framework to support the delivery of the overall vision and ambitions. They would benefit from development with key partners (in particular the RTAs) to hone them to a set of more specific actions that are ambitious, but deliverable based on the available resources (yet to be identified).

Active Travel priorities – Healthy Travel Charter: More consideration needs to be given to how will workplace travel plans be developed. The reintroduction of regional Travel Plan Coordinators (albeit with a refocused role) would be welcomed.

To aid understanding and interpretation the plans would benefit from a high level simplified programme/Gantt chart that identifies indicative timescales and delivery targets. This would help all involved to better plan and manage their available resources.

Measures: As previously mentioned, measures should be SMART and be aligned with clear targets.

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 No

Do you have any comments?

Clearly outlining how this strategy aligns with the WBFGA is helpful and should continue through to delivery of any the strategy.

Involvement & collaboration: engagement should be at as early a stage as possible to more effectively inform policy development and delivery. The WLGA and CSS Wales can offer valuable support with this.

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?

This would need to be discussed, developed and implemented via the CJC/RTAs to ensure the full implications were understood and that the desired outcomes are achieved. This would require appropriate accommodation within SDPs, RTPs & LDPs.

Question on the Integrated Sustainability Appraisal

We have also published an Integrated Sustainability Appraisal (ISA). The aim of this is to ensure that the Wales transport strategy has considered the impact of transport on the environment, health, equalities, Welsh Language, rural issues, children and young people, economic development as well as wider sustainability issues, within the context of the national well-being goals in the Well-being of Future Generations (Wales) Act 2015.

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

Yes No

Q10B: Are there any gaps?

The ISA appears to provide a sound framework upon which the WTS can be progressed and delivered. Through the monitoring and review process, it will be important to cross reference back to the issues identified in the ISA to check for ongoing compliance and impact assessments.

Specific comments

The ISA states the Llwybr Newydd provides 'a long-term vision for transport over the next 25 years' in various places (e.g. 1.1.2 & 1.1.9 in the non-technical summary and 1.1.4 of the introduction) whereas the WTS states a 20-year horizon. The ISA should be corrected accordingly.

1.1.11 & 12: is the reference to NDF correct?

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

Issues around disability should be considered in their widest sense (e.g. learning disabilities as well as physical disabilities).

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 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?

No comment.

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.

No comment.

Question C: We have a duty to consider the impact of our policies on people or groups who share protected characteristics.

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

No comment.

Question D: Do you think the draft 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?

None identified at this stage.

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

Please enter here:

The strategy does not mention of EU transition. It would be helpful to include comments about the challenges and opportunities WG foresees with the EU transition and how they will be addressed, particularly around ferry terminals and freight hubs.

As highlighted throughout, there is a lack of information on whether or not the 20-year vision has been costed and what the funding commitment is to deliver it. This should at least be available for the first 5-year delivery period of the strategy.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: