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 broadly agree with the proposed long-term vision for "An accessible, sustainable transport system" (as set out on pp11-12 of the draft Strategy).
>
> We would however suggest adding 'Safe'. And perhaps place 'sustainable' first, given the critical importance of decarbonising transport in accordance with the Welsh Government and Parliament's declarations of a Climate Emergency. The resulting wording could therefore be for "A sustainable, accessible and safe transport system".
>
> We also voice concern that some aspects of the draft Strategy - notably the 'mini-plan' for roads, streets and parking, section 7.4 - could be contrary to the above vision.

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:

> As they stand, the 20 year ambitions (as set out on pp13-23 of the draft Strategy) are generally sound. We fully support the ambitions in relation to being "Good for the economy and places in Wales" (section 2.3) and "Good for Welsh culture and language" (section 2.4).
>
> Regarding the "Good for the environment" ambitions (section 2.2), we are concerned that they do not include an explicit ambition to **reduce motor traffic**. We discuss this below.
>
> We also suggest adding a reference to the **rights of way (RoW) network** under ambition

C2 (again, see below).

We are surprised though to see these ambitions set out under the headings of the 4 pillars of sustainability (i.e. 'people and communities', 'environment', 'economy' and 'people and culture), rather than the 7 well-being goals from the Well-being of Future Generations Act. By doing so, the opportunity is missed to set out ambitions in relation to resilience and (crucially) health, as well as distinguishing equality and cohesion. Transport's adverse health impacts are strongly linked with (and exacerbate) inequalities, i.e. disadvantaged groups and communities typically suffer worse pollution, road danger, noise, and isolation due to poor transport accessibility to key facilities and services. We urge that the strategy includes ambitions to reduce these health inequalities. It also needs to recognise the existence of 'transport poverty' and commit to addressing it.

If it is decided to retain the approach of presenting the ambitions in relation to the 4 pillars of sustainability (rather than the 7 well-being goals), then ambition S2 could be expanded to say "More people walk and cycle, contributing to a healthier lifestyle, reducing traffic and its adverse impacts on communities (particularly in disadvantaged areas), and promoting greater equality of access to education and employment opportunities and key services". The supporting bullet-points should include one on adopting both traffic management measures and charging schemes to reduce traffic both overall and in specific localities.

Road traffic reduction

Across the UK, greenhouse gas (GHG) emissions from transport have changed little since 1990, while those from other sectors (notably energy and industry) have declined markedly. Therefore, transport share (by end user) of total UK GHG emissions has increased steadily from 18% in 1990 to 31% in 2018 – or from 24% to 37%, if we consider only CO_2 emissions.[1]

The Committee on Climate Change (CCC, the statutory advisor to UK Governments on meeting their carbon budgets under the Climate Change Act 2008) has strongly criticised the lack of progress on reducing transport emissions.[2] Calling for substantially increased progress in every sector, the CCC added that this need was *"especially acute for those sectors such as transport … where emissions have not fallen significantly over recent years".*

More recently, it has called on the Welsh Government to *"join the net zero club"*,[3] increasing its ambition from a 95% reduction in greenhouse gas (GHG) emissions by 2050 (based on 1990 levels) to an aim for 'net zero' by that date. The CCC notes that Wales's total GHG emissions have so far fallen by just 31% since 1990 (compared with 41% for the UK as a whole). For surface transport, Wales's GHG emissions were 2% lower in 2018 than in 2016, yet they were still 3% higher than in 1990, as a 13% increase in distance travelled had outweighed 9% improvement in vehicle efficiency.[4] In addition to policies aimed at boosting the use of electric vehicles, the CCC recommends a 9% reduction in car-km by 2035 and a 17% reduction by 2050.[5]

Other compelling reasons to reduce our dependence on motorised travel include:

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[1] See references **Error! Bookmark not defined.** and **Error! Bookmark not defined.**.
[2] www.theccc.org.uk/wp-content/uploads/2019/07/CCC-2019-Progress-in-reducing-UK-emissions.pdf
[3] www.theccc.org.uk/2020/12/17/net-zero-wales-by-2050-wales-faces-a-decisive-decade-to-get-on-track-to-an-emissions-free-future
[4] www.theccc.org.uk/wp-content/uploads/2020/12/Progress-Report-Reducing-emissions-in-Wales.pdf
[5] www.theccc.org.uk/wp-content/uploads/2020/12/Advice-Report-The-path-to-a-Net-Zero-Wales.pdf

- *Congestion:* Based on UK-wide figures,[6] we estimate the annual economic cost of congestion in Wales to be around £1bn.
- *Air pollution:* Pollution, notably nitrogen dioxide (NO_2) and particulate matter ($PM_{2.5}$), is estimated to contribute to between 28,000 and 36,000 early deaths annually in the UK.[7] The economic cost of pollution in Wales, due to health service costs and lost working days, is estimated to be £1bn, with road transport accounting for two thirds of air pollution at urban monitoring sites.[8] The UK Government has faced several successful legal challenges over its failure to reduce pollution to within legal limits,[9] while the Welsh Government has also admitted past failings in this regard.[10]
- *Road danger:* 95 people were killed and another 5,713 were reported as injured (1,098 of them seriously) on Wales's roads in 2019. Using average valuations for GB casualties, we estimate the economic costs of these casualties to be £524m.
- *Physical inactivity:* 47% of adults in Wales are insufficiently active to meet recommended guidelines.[11] Physical inactivity increases the risks of cardiovascular disease, type 2 diabetes, colon cancer, dementia, fractures and depression, while increasing all-cause mortality by 30%. Its annual economic cost in Wales is estimated to be £650m.[12]

To deliver these benefits, the WTS needs to set out policies aimed at:
- Reducing travel overall – e.g. investing in broadband to reduce the need to travel for business meetings etc;
- Reducing the lengths of journeys – e.g. by planning and locating new developments such that housing, employment and retail opportunities are closer to one another (i.e. "destination shifting"); and
- Enabling people to switch from car travel to healthier and more sustainable alternatives (i.e. "mode shifting").

In a research paper for Friends of the Earth,[13] consultancy Transport for Quality of Life (TQL) estimated that, to be on course for a 'net zero' economy by 2045 (i.e. 5 years before the UK Government's subsequently-adopted target date), we will need to reduce the distance travelled by motor vehicles by at least 20% by 2030, even under the most optimistic scenario for switching to battery-electric vehicles and decarbonising their power supply. Under more pessimistic assumptions, that figure increases to 60%.

TQLs assumptions have been superseded by subsequent UK Government decisions on the timescales for phasing out petrol and diesel cars. However, even with a rapid switch to battery-electric cars and low-carbon electricity to power them, road traffic will still clearly need to be reduced substantially to meet the CCC's proposed 'net zero' target.

The Scottish Government has committed to reduce car traffic by 20% by 2030,[14] while the South East Wales Transport Commission's report suggests that similar levels of traffic reduction are necessary and achievable on the M4 corridor around Newport.[15] We urge the Welsh Government to follow their lead by setting a target date for halting

[6] www.clearview-intelligence.com/blog/were-jamming-and-not-in-a-good-way-the-cost-of-congestion-on-the-uks-roads-is-30-billion
[7] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf
[8] www.wales.nhs.uk/sitesplus/documents/888/PHW%20Air%20pollution%20report%20%28final%20English%29.pdf
[9] www.clientearth.org/government-loses-third-air-pollution-case-judge-rules-air-pollution-plans-unlawful
[10] www.clientearth.org/latest/latest-updates/news/welsh-government-admits-in-high-court-no-plan-on-air-pollution-was-unlawful
[11] https://gov.wales/sites/default/files/statistics-and-research/2020-07/adult-lifestyle-national-survey-wales-april-2019-march-2020-390.pdf
[12] www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health#why-promote-physical-activity-in-your-professional-practice
[13] https://policy.friendsoftheearth.uk/insight/more-electric-cars
[14] www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/
[15] https://gov.wales/south-east-wales-transport-commission-final-recommendations

the growth of motor vehicle traffic, with further targets for reducing it thereafter. These targets need to 'follow the science', ensuring that road transport is on track to meet its share of the Government's 'net zero' target and its carbon budgets. Our response to question 5 provides further comment on how to establish these targets, while the need for adequate monitoring data (and the investment this will require) is covered in our response to question 4.

Enhancing the rights of way network to support active travel (as well as for recreational access to the countryside).

Cycling UK wholeheartedly agrees with the Welsh Government's distinction between 'active travel' and recreational walking and cycling. However, one cannot make such a clear-cut distinction between the purposes of the (predominantly urban) active travel and the (predominantly rural) rights of way networks. Indeed their purposes are particularly blurred in 'urban fringe' areas, where off-road walking and cycling routes can serve both to enable 'utility' journeys from outlying settlements into a town (e.g. pupils travelling to their nearest school), and to enable families living in a town to go out for walk or cycle rides in the surrounding countryside at the weekend. Where the Rights of Way network serves this kind of dual purpose, it is particularly important that it is surfaced, lit and maintained to standards suitable for making utility journeys in all weathers at all times of year. The WTS needs to explicitly recognise this blending of 'active travel' and rights of way networks, and to put in place network planning and funding processes which facilitate this blending. The WG is already considering reforms to rights of way (RoW) law that could open up a much greater proportion of the RoW network for cycling (and indeed for horse-riding), while the replacement of Common Agricultural Policy (CAP) funding provides an opportunity to incentivise landowners to increase access (or to recompense them for doing so). This funding source could also be used to secure improvements to the National Cycle Network.

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

Strongly agree ☐   **Agree** ☑   Neither agree nor disagree ☐

Disagree ☐   Strongly disagree ☐   Don't know ☐

No opinion ☐

Please provide your comments:

The 5 five-year priorities set out in Chapter 3 are basically sound. However we believe they should include an explicit goal to halt the growth of motorised road traffic and to start reducing it within 5 years.

Our comments on the detailed drafting of the 5 priorities are as follows:

- *Priority 1:* Replace the concluding words to say:
  "…so that people need to use cars less."
  The draft WTS's current wording (*"… so that fewer people need to use their cars on a daily basis"*) assumes that car ownership is, and will remain, the norm. Our suggested wording is clearer and more concise, and does not presuppose whether it will be less necessary for people to use the cars they own, or whether they will

have less of a need to own a car in the first place.

- *Priority 2:* Amend the wording of the final bullet point *("Improve journey planning to make it easier to switch between different types of transport")* to include inter-modal ticketing and payment systems, and to include bike-share schemes within this.

- *Priority 4:* Replace the words *"… whilst respecting the fact that many people, including those in rural areas or disabled people, may not have options"*. This is unduly pessimistic about the potential for change. It is currently true for some people and/or for some journeys, however there are not "many" people for whom it is true for all of their journeys – nor should we expect it to remain this way. We suggest the following wording:
  "…whilst acknowledging that some people, particularly disabled people and those in rural areas, currently lack viable alternative options to the car for at least some of their journeys".

  We also make the following comments relating to the supporting bullet-points for priority 4:
  - *First bullet-point:* any 'scrappage scheme' to replace older vehicles should provide 'mobility credits', following the approach adopted in Scotland. These can be used to purchase pedal cycles (including e-bikes), or public transport tickets (including season tickets), or to use public bike-share schemes. It should not be assumed that people are simply offered cleaner cars as replacements, as this approach fails to tackle congestion, road danger, physical inactivity or the lethal particulate pollution associated with tyre and brake dust.
  - *Last bullet-point:* After "marketing campaigns, insert "targeted opportunities to try cycling". Initiatives such as adult cycle training, or Cycling UK's Big Bike Revival, Community Clubs and Cycling for Health programmes, are highly cost-effective at increasing not just the numbers of people who cycle but also the diversity of those who cycle, boosting cycle use among women, older people, ethnic minority groups, health patients, lower income groups and those facing multiple deprivation.
  - Add one further bullet point: *"Supporting innovative forms of active travel – such as electrically-assisted cycles, bike-share schemes, non-standard cycles (particularly for people with disabilities) and pedicabs"*.
    [N.B. This last point could go either under Priority 4 or Priority 5].

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

Please provide your comments:

We do not have a strong preference between the draft WTS's 5-point set of priorities and the 3-point set listed above. However, like the original 5 priorities, this 3-point version needs to include an explicit aim to halt the growth of road traffic and begin to reverse it within 5 years. One way to do this, while achieving even greater brevity, would be to make it clear that both the first and second of these bullet points (i.e. reducing the need to travel and promoting modal shift) are part of a wider aim to reduce motor traffic.

If this 3-point set is adopted, we would also suggest revising the 3rd point to give greater weight to its second half. It is easier to encapsulate the idea of a transport system that is resilient to the impacts of climate change within a wider point about a well-maintained, safe and accessible transport system. We suggest rewording it to say:

"We will ensure Wales's transport system is well maintained and managed so that it is safe, accessible to all and resilient to the impacts of climate change."

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?

The most important omission from Section 4 is any measure of road traffic. Reducing (motorised) road traffic must be THE central measure of the success or otherwise of this strategy. It is not good enough to promise vaguely that the WG *"will look to set more specific targets around for example car mileage."*

The WTS should also include a target for an overall reduction in road casualties (or fatal and serious injuries), along with specific targets to reduce the risk of walking and cycling. The latter must be 'rate-based' (e.g. to reduce the risk of serious and fatal cycling injuries per mile travelled, or per trip), in order to avoid creating a perverse disincentive to deter cycling per se. Given that the health benefits of cycling far outweigh the risks, a simple casualty reduction target could be counter-productive in public health terms, i.e. if it incentivised road safety practitioners to do anything that deterred people from cycling, this would almost certainly shorten more lives than it saved.

Finally, section 4 should say more about how these targets and indicators will be monitored. The Welsh Government has historically been very poor at investing in data collection and monitoring. The WTS must explicitly address this.

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?

We suggest that targets for mode shift to sustainable transport should be derived from the motor traffic reduction targets we propose in response to Q4. The first step is to identify the level of traffic reduction needed for transport to be on course for

contributing its fair share of the carbon reductions needed to reach net zero by 2050 – let us call this X% (noting again that the Scottish Government has set an ambition to reduce car-km by 20% by 2030).). The WG should then commission modelling to identify the X% of road traffic mileage that could most easily be switched from car use to a sustainable alternative. (N.B. In addition to straightforward mode-shift, this process should also recognise the scope for some journeys to be replaced with shorter trips, and others not to be made at all, e.g. thanks to broadband investment). This in turn would provide evidence-based targets for increases in walking, cycling and public transport that were in line with the WG's wider 'net zero' ambition.

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?

We agree with many of the actions suggested in Chapter 5 of the draft WTS. However we would make the following alternative or additional suggestions.

5.1 Investing sustainably

We welcome the commitment to *"give priority to active travel and public transport infrastructure"*. We also welcome the acknowledgement that the WG *"will [also] need to support measures such as better information, educational and marketing campaigns, and also innovations that help people to adopt more sustainable transport choices."* Such initiatives can provide a highly cost-effective complement to active travel infrastructure investment (though they are no substitute for it), and are particularly effective at boosting the diversity of people taking up cycling.

Cycling UK's Big Bike Revival (BBR), Community Clubs and Cycling for Health projects have consistently demonstrated their effectiveness– and cost-effectiveness – in boosting cycle use, particularly among groups which are under-represented in cycling:

- The *Big Bike Revival* (www.cyclinguk.org/bigbikerevival) has been running in England and Scotland since 2015, in conjunction with local bike-recycling projects and similar social enterprises, with support from DfT. It involves open days where people are encouraged to bring along bikes that have lain unused, which often need a simple fix. They are offered free cycle checks, servicing, cycle maintenance workshops, cycle training and accompanied rides. 46% of participants in *Big Bike Revival* events in England were non-regular cyclists, almost half were women and 46% were from the top 30% most deprived areas in the country.

- *Community Clubs* (www.cyclinguk.org/community-cycle-clubs) are run in partnership with a wide variety of community groups, whether for women, health patients, people with disabilities or other disadvantaged groups. They offer longer-term support for people interested in taking up cycling, for whatever reason. They can often be formed in the aftermath of a Big Bike Revival project. We have set up over 200 clubs in England and Scotland, which have attracted 50,000 participants. Half of them were women, 53% are from the most deprived three deciles of neighbourhoods, 56% are from BAME backgrounds and 50% or attendees are non-

regular cyclists on joining. 20% of participants have a disability or long-term health condition and 30% are inactive, meaning they were not doing 30 minutes of exercise per week prior to joining the club.

- Our *Cycling for Health* project (www.cyclinguk.org/community-outreach/health) has been run through 8 'cycling hubs' throughout West Yorkshire, with support from the West Yorkshire Combined Authority. It enables people with inactivity-related physical and mental health conditions to take up cycling as part of a sociable and supportive group. The majority of participants are now referred to the programme by local health professionals. Of the programme's 270 direct beneficiaries, 56% were from recognised areas of deprivation with 31% coming from the highest decile of deprivation. 78% were female and 28% identified as being of non-white ethnicity. 90% were previously non-cyclists, yet 68% were still cycling regularly (i.e. more than once a week) 6 weeks after the programme had ended. Participants said they felt more confident, more relaxed, closer to other people, better able to think clearly and deal with problems, and more optimistic about the future.

We also urge the addition of a paragraph on **"Maximising synergies between investment programmes."** We particularly urge the WG to be more proactive in encouraging Welsh local authorities to maximise the opportunities for active travel improvements as part of their work on:

- *Planned highway maintenance:* when a highway is being resurfaced, this is an excellent opportunity to consider how it could be redesigned at the same time to be more pedestrian and/or cycle-friendly, e.g. by adding coloured surfacing, or traffic wands or planters to create segregated cycle lanes, while the work-gang is on site anyway.
- *Planning new developments:* New developments need to be located, planned and designed in ways that support active and sustainable travel. They should reflect the principle of 20 minute neighbourhoods[16] or 15 minute cities.[17] Their street layouts should be planned to prevent 'rat-running' motor traffic, while being permeable for walking, cycling and buses. Local streets should have a 'default' design speed of 20mph, with exceptions (i.e. the faster and/or busier main roads) being provided with high-quality separate cycle facilities. There should be mechanisms for securing developer contributions to fund new or improved walking and cycling infrastructure in the vicinity of the development.
- *Rights of Way:* We noted in answer to Q2 that there needs to be better integration between active travel networks and rights of way networks. The former are predominantly (but not exclusively) urban and focused on 'utility' walking and cycling, whereas the latter are more rural and are associated more with recreational walking and cycling. However this distinction is not clear-cut, particularly in 'urban fringe' areas, where improvements to rights of way networks could often support utility cycling and walking, as well as enabling urban-dwellers to access their surrounding countryside without needing to jump in a car. Hence it is important to plan and fund active travel and rights of way networks synergistically – too often, their management and funding is siloed, and opportunities are missed as a result.

5.2 Delivery and action plans

Despite generally supporting the vision, the ambition and priorities of the draft WTS, it

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[16] www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods
[17] www.c40knowledgehub.org/s/article/How-to-build-back-better-with-a-15-minute-city?language=en_US

is frustrating that so much of the detail of how to achieve these is being left till later. The lack of clarity particularly on funding and on monitoring arrangements (see previous comments on section 4) makes it hard to be confident about whether the vision, ambition and priorities will be achieved – particularly given that the 'mini-plan' for roads, streets and parking (section 7.4) leaves open the possibility of road building.

Yet even if we accept the limitations of this process, the draft WTS needs to be clearer about the synergies between the headings within this section. In particular, the proposed *'Decarbonisation pathway for transport'* needs to be based on a level of *'Demand management'* which is in line with the 'net-zero' ambition called for by the Committee on Climate Change. Road pricing and other financial measures should then complement improvements in provision for active and sustainable travel, to deliver the required reductions in motorised road traffic.

5.3 Working in partnership

In addition to the partnerships identified, the WTS should also refer to the role of:
- *The police and other road traffic law and enforcement bodies*, given their vital importance for road safety (and particularly for the safely of more vulnerable road users -for more, see cycling UK's submission to the UK Government's roads policing review.
- *Rights of way officers, National Resources Wales and other bodies responsible for outdoor access,* in order to maximise the synergies between active travel and rights of way networks (see our response to Q2).

5.4 Better transport governance and policies

We welcome the commitment to update Technical Advice Note TAN 18.

We urge that the proposed review of trunk road maintenance standards should create opportunities to improve conditions for active travel.

We note the proposal to "review our approach to local speed limits", but are puzzled that this makes no mention of the WG's existing (and very welcome) commitment to make 20mph the default speed limit for built-up streets. We would nonetheless welcome a review of speed limits for rural single carriageways, as we believe that here too there is a need to reduce the default limit.

In addition to the documents mentioned, the WTS also needs to consistent adherence to the Welsh Government's 'WelTAG' transport assessment guidance and its Active Travel guidance (which is currently subject to review).

Crucially though, there are serious issues of transport governance surrounding the relationship between the Welsh Government, Transport for Wales (TfW), Welsh local authorities and other stakeholders. The role of TfW still needs clarifying, both in general and specifically in relation to active travel. There are various ways this could be done. We would favour a model where responsibility for delivering active travel remains mainly with Welsh local authorities (other than where trunk roads are involved), while TfW acts as an arms-length supportive inspectorate for active travel. In other words, it would help build local capacity and skills in delivering active travel, as well as offering expertise, but would also report on local authority performance to the minister and to the Active Travel Board. Where local authorities are underperforming, TfW could recommend either additional support or, if that fails, the withholding of funding.

Whether the WG adopts this or some other model though, the WTS needs to say something about the role of TfW. At present, this is conspicuous by its absence.

5.5 Building skills and capacity

We note that there is a particular need to boost the skills and capacity needed to plan and design active travel infrastructure in Wales.

5.6 Holding ourselves to account

We particularly welcome the commitment to "build our capacity to gather data". Wales is currently lacking in good transport data, including levels of walking and cycling in general, and particularly among specific demographic groups. This impedes the monitoring both of the effectiveness of measures to boost active travel, and also to provide 'rate-based' measures of pedestrian and cycle safety (as called for in our response to Q4).

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?

The 'mini plans' (set out in Chapter 7) are generally sound but superficial, with the Active Trave mini-plan being particularly weak. We believe they could be strengthened as follows:

7.1 Active Travel

The text relating to 'Significantly reduc[ing] the environmental impact of travel' should also refer to reductions in noise and in the visual impact of transport infrastructure and activity. The latter includes both the impact of roads on rural landscapes and of parking in urban and rural areas alike.

The text relating to "Deliver[ing] benefits to the economy and places in Wales" should also refer to:
- reduced congestion;
- greater footfall in shopping streets;
- quieter, safer and pleasanter residential neighbourhoods ,and
- reductions in health-related costs, including absenteeism.

The 'Priorities' section should:
- emphasise the importance of planning active travel networks (not just isolated active travel routes);
- promote the use of electric pedal cycles (there is good evidence that they could massively increase the potential to attract people from car travel to cycling, particularly for longer or hillier journeys[18]);

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[18] https://2z30i71k4m1tu9odh1fx8yq1-wpengine.netdna-ssl.com/wp-content/uploads/2019/07/The-Case-for-a-UK-Incentive-for-E-bikes-FINAL.pdf

- promote public bike-share schemes;
- add the words *"particularly among under-represented groups"* at the end of the bullet-point about behaviour change programmes to encourage update of healthy and active travel".

The section on 'How we will deliver these priorities' should refer to:
- Behaviour change projects, particularly those aimed at boosting active travel among under-represented groups;
- Support for e-bikes, public bike-share schemes and cargo-bikes.

In the section on the 'Five ways of working', the text on 'Integration' should talk about integrating active travel with:
- Planned highway maintenance works;
- New developments; and
- The Rights of way network.

For more on each of these, see our comments on section 5.1 of the draft WTS, in our response above to Q6.

7.2 Bus

Under the 'Five ways of working' heading, we suggest rewording the text on 'Integration' to say:
"Work with providers to better integrate bus services with other forms of transport, including facilities for carrying cycles on rural and inter-urban buses and coaches."

7.3 Rail

Under the 'Five ways of working' heading, we welcome the commitment to "Better integrate rail services with other forms of transport including bus [and] active travel." However we suggest the following additions:
- After *"rail services"* add *", ticketing and payment schemes"*;
- After *"active travel"* add *"and shared transport (including bike share schemes)."*

7.4 Roads, streets and parking

We welcome the opening statement, that *"Our first priority is to reduce the number of car and private vehicle journeys in order to reduce associated environmental and health impacts"*. We reiterate our earlier calls for targets to indicate how quickly these reductions will be achieved.

In the 'Vision' section under the heading about significantly reduc[ing] the impact of travel, add a bullet-point about *"reduc[ing] the visual impact of transport infrastructure and activity, including parking"*

In the 'Priorities section, we are very concerned that one stated priority will be to *"upgrade, improve and future-proof our road network, addressing congestion pinchpoints..."*. We strongly urge that this bullet-point is re-worded to focus solely on measures that will enhance environmental and safety outcomes. There should be no need to increase the capacity of the road network if (as staged on p78) the aim is to *"reduce the number of car and private vehicle journeys"*.

We also call for an additional bullet-point about *"improv[ing] the integration of planned*

highway maintenance and active travel programmes." For more on this, see our comments on section 5.1, in response to Q6.

In the section on the 'Five ways of working', we are concerned that the 'Involve' section talks about 'Involv[ing] people in the design of road upgrades..." Road upgrades are not referred to elsewhere in the strategy and would seem to be counter to its vision, ambitions and priorities.

The section on 'Integration' should refer to the value of integrating active travel with planned maintenance works, development planning and the management of rights of way networks (again, see our comments on section 5.1, in response to Q6).

7.6 Taxis and private hire vehicles

This section should include reference to pedicabs as follows:

- The opening section on reducing the environmental impacts of travel should include a bullet-point about the role of pedicab services;
- The opening section on delivering benefits to the economy should reference a *"thriving professional taxis, PHV and pedicab sector"*.
- The priorities section should include a commitment to develop a regulatory framework for pedicabs and pedicab services (or to press the UK Government to develop one), which enables safe, well-run, and reputable pedicab businesses and operators to flourish.

7.7 Freight and logistics

This section should seek to address the safety impacts (as well as the environmental impacts) of excessive dependence on road freight. It should also say more about:
- Edge-of-town 'multi-modal hubs', which enable long-haul road or rail freight cargoes to be transferred either to smaller urban delivery vans, or to cargo-bikes, for last mile' deliveries (these are mentioned in the introduction to this mini-plan, but do not feature thereafter);
- The role of cargo-bikes in reducing road freight use (particularly for 'last mile' deliveries);
- The opportunities to integrate safety and environmental improvements (e.g. combining safer and more aerodynamic lorry cab designs) and the role of public sector bodies in promoting a shift to safer and greener lorries.

The introductory section on 'Significantly reduc[ing] the environmental impact of travel should refer to cargo bikes.

The Introductory section on Deliver[ing] benefits to the economy and places in Wales should refer to:
- Safe 'direct vision' lorry cabs
- Safer urban lorries for last-mile deliveries
- The role of both railfreight and cargo bikes in reducing overall lorry use, and hence its adverse impacts on congestion, pollution, road danger and noise.
The above three points should also be referenced in the 'Priorities' section.

The 'Five ways of working' section should refer to:
- Cargo bikes in the section on 'involving' other partners
- Reducing lorry-related injuries and (particularly) deaths in the 'Prevent' section
- Multi-modal hubs in the section on 'Tak[ing] a long-term view.'

7.8 Ports and maritime transport

The introductory section on "Reduc[ing] the environmental impact of travel" should refer to the aim of *"improv[ing] access to ports by public transport and active travel."*

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?

We have nothing to add. However, as noted previously, we are surprised that the Ambitions of the WTS relate to the traditional 4 pillars of sustainable development, rather than the 7 Well-being goals of the WFG Act. The Act itself stresses that equal weight should aim to address all 7 goals, not just a limited subset of them.

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?

We are concerned that this question starts with the word "If", given that the vision and delivery plan for the 'roads, streets and parking' mini-plan (pp79 and 81) suggests unequivocally that it will happen. We strongly believe it needs to happen, while fully recognising the need for this to be done in an equitable way.

Road user charging, in its various forms (including congestion and pollution-based road user charging, and parking charges or levies) can be made equitable by using the proceeds to improve the opportunities for sustainable travel by those who are least able to use a car, whether on grounds of low income, age, disability or health conditions. Not only are these groups disproportionately dependent on non-car travel, but they are also disproportionately affected by the road danger and pollution created by road transport. They are also most likely to suffer 'transport poverty' i.e. to live in poorly-connected locations which lack good public transport or safe walking and cycling networks.

Specific examples of ways that charging revenues can be channelled to benefit these disadvantaged groups include:
- Walking, cycling, road safety and streetscape improvements in disadvantaged areas.
- Improved provision of public transport and public hire-bike schemes in disadvantaged areas, including training and employment opportunities for local people to maintain and manage the public hire-bike fleets (the partnership between Nextbike and Pedal Power in Cardiff is an excellent example of this)[19];
- Programmes offering targeted opportunities to take up cycling and walking
- 'Scrappage schemes' which provide mobility credits in return for handing in older or more polluting cars and vans.

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[19] https://www.nextbike.co.uk/en/cardiff/news/collaboration-is-key-for-cardiff-bike-share-success/

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?

We have not scrutinised the ISA report in detail. However we note that points made our consultation response to the draft report have been taken on board and that, as a result, the framework explicitly recognises the case for motor traffic reduction, as well as being stronger in its recognition of various health impacts and the crucial issue of health inequalities.

We point out one detail. In the first box of Table NTS-2, the words "Walking and cycling is…" should be amended to "Walking and cycling are…", with other words in this sentence being amended to the plural. Walking and cycling are distinct transport modes.

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

Having been generally supportive of the draft report, and noting that several of our comments on that draft have since been incorporated, we do not feel the need to comment further, other than to commend the effort which has clearly gone into it.

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?

Cycling is a form of transport that is readily accessible to people regardless of their age, background and economic status, and for people of almost all abilities.

Motor traffic is associated with a range of health inequalities. People from lower income groups are more likely to suffer higher road casualty rates, worse air pollution, and fewer social connections due to heavily trafficked roads. They are also more likely to suffer from 'transport poverty' i.e. a lack of transport access or provision for reaching employment and training opportunities, as well as poor access to key services such as shops, healthcare, recreational facilities and green open space. Improving cycling conditions and providing targeted opportunities for people from disadvantaged groups to 'give cycling a try' can be transformational in overcoming these barriers to social inclusion.

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?

There are risks that road pricing in its various forms, and local motor vehicle restrictions, could disadvantage those who are least able to pay for transport access. However the Welsh Government is rightly keen to avoid this risk.

We have suggested that the revenues from any charging scheme should be invested in provision for cycling and other more inclusive forms of transport, including projects specifically to boost healthy and sustainable mobility among these groups.

The issues of access for visually impaired people are difficult to resolve. They tend to rely for navigation on kerbs, which are obstacles for users of cycles and wheelchairs. It is important for street layouts to provide tonal and textural contrasts that can be detected by visually impaired people. There is also merit in some standardisation of the visual palette for street designs. In the Netherlands, black is used for roads, grey for footways and red for cycle facilities. This predictability does not solve all problems for visually impaired people but it goes a long way to addressing some of them.

Question E: Are there any further comments that you would like to make on Llwybr

Newydd: a new Wales transport strategy?

Please enter here:

We have no further comments to add, however we feel that a summary of our key points may be helpful.

- We broadly welcome the draft WTS's long-term vision, its 20-year ambitions and its 5-year priorities. However we are concerned at the **lack of clarity on delivery and spending plans** to achieve the admirable fine words. Without them, we cannot yet feel confident that they will be achieved in practice.
- We strongly urge the inclusion of an explicit aim to **halt and reverse the growth of motorised traffic**, to set **targets** for this (which should be in line with the wider 'net zero' ambition proposed by the Committee on Climate Change), and then to derive from these targets some wider **'mode-shift' targets** for increased use of sustainable transport, backed by **spending and delivery plans** to achieve this.
- We would welcome a greater emphasis on **safety** within the overall vision, and more detail on how to achieve this in terms of (a) strengthened **enforcement of road traffic law**; (b) **reductions in speed limits** for rural single carriageways, as well as the proposed 20mph default speed limit for urban streets; and (c) **fewer and safer lorries**.
- We call for greater **integration** of measures to promote active travel in the context of (a) **planned highway maintenance works** (when a road is being resurfaced, this is a highly cost-effective opportunity to redesign it to be more cycle-friendly); (b) **new developments**; and (c) the planning of **rights of way networks** (rather than seeing these as primarily recreational, there must be greater recognition of their potential to extent active travel networks into urban fringe and rural areas – this dual role should be reflected by the standards of signing, lighting and surfacing.
- We call for greater **integration of active travel with public transport**, particularly in terms of **inter-modal payment and ticketing systems**. These should include **public bike-share schemes**.
- Public bike-share should be given greater prominence in the mini-plan for active travel. So too should **electric pedal cycles, cargo cycles, non-standard pedal cycles and pedicabs**.
- Whilst we welcome the recognition of the need to do more to support **behaviour change programmes** (to complement active travel infrastructure investment), we urge recognition of the particular value of initiatives aimed at boosting cycle use among **groups who are under-represented** in cycling, e.g. women, older people, health patients, people with disabilities, and those from minority ethnic and economically disadvantaged groups. Cycling UK's 'Big Bike Revival', Community Cycle Clubs and Cycling for Health programmes have been highly effective at reaching these groups.
- We call for action to **boost the capacity and skills** needed to deliver cycling and active travel infrastructure in Wales.
- Finally we urge greater clarity on **monitoring and governance**. The WTS needs to commit to much better data collection and monitoring than the WG has managed in the past. It also needs to clarify how the resulting data will be used to ensure accountability. There is a particular need for greater clarity on the role of Transport for Wales. We suggest TfW should not only provide

support and capacity-building for Welsh local authorities on active travel, but should also act as a sort of inspectorate, assessing their performance both to Ministers and wider stakeholders through the Active Travel Board. Ultimately though, it needs to be clear that any underperformance will be identified and acted on, so as to ensure continuous improvement.

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: