

National transport delivery plan (NTDP): 2022 to 2027

Your name: Cherry Allan, Cycling UK Campaigns

Organisation (if applicable): Cycling UK (cyclinguk.org)

Email / telephone number: Cherry.allan@cyclinguk.org / Main line: 01483 238301

Your address: Cycling UK, Parklands, Railton Road, Guildford, Surrey, GU2 9JX

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:

Q1. Do you think the plan will have a positive impact on the Welsh Government targets for creating modal shift to more sustainable forms of transport?

- very positive
- positive
- neutral
- negative
- very negative

Please provide comments and reasons for your response here:

Before explaining why we believe the National Transport Delivery Plan (NTDP) as drafted will have a “very negative” impact on creating modal shift to more sustainable transport, we should state that we were pleased to be involved in the Government’s open and constructive discussions on the draft Llwybr Newydd and, while not all of our suggestions carried forward to the final version, we broadly welcomed the Strategy’s long-term vision, ambitions and five-year priorities.

Further to the NTDP, we applaud a good deal of its content including, in general terms:

- Education, marketing and other tools to transform the image of walking, cycling and public transport
- Applying the COM-B model for behaviour change
- News of a National Travel Survey for Wales
- The introduction of ‘Bikeability’ national standards and the expansion of training outside of school
- Encouraging e-bikes and e-cargo bikes
- Integrating active travel with public transport
- Integrated journey planning
- Public cycle hire

- Moves to expand cycle storage, including the introduction of on-street cycle hangers.

Although some of the above would benefit from strengthening and/or fleshing out, plus a tighter timescale (as discussed below), Cycling UK welcomes their appearance in the Plan.

This is also a good opportunity for us to commend the Government for its decision to introduce a national default 20 mph speed limit on restricted roads. This is an exemplary advance, which we hope other UK nations will follow.

But, importantly, in the run-up to the final Llwybr Newydd and after it appeared, Cycling UK expressed its frustration that the Strategy left so much detail till later. This made it hard for us to be confident that the Government's vision, ambitions and priorities would ever fully materialise.

To our mind, therefore, much rested on the Delivery Plan, especially as the Llwybr Newydd said that this would be "detailed" and set out "specific transport interventions financed by the Welsh Government" and "identify expenditure based on the priorities in Llwybr Newydd".

To our disappointment, however, and despite there being aspects of the NTDP that promise well for sustainable transport, the Plan as drafted fails singularly to allay our fears.

Principally, as far as active travel is concerned, it fails to deliver on:

- Delivery
- The original concept of the 'sustainable transport hierarchy' and putting it into practice
- Timescales / urgency over crucial measures / detail
- Long-term funding
- Governance, monitoring and accountability

The Plan also omits or glosses over a number of measures that could make a useful contribution to delivering on Llwybr Newydd (more on that later).

In other words, we believe the NTDP's impact can only be "very negative" because it does not assure us in the least that even the projects likely to be most impactful – and there are several of them – will ever be delivered, especially by those local authorities who tend to drag their feet over providing for active travel, despite the Active Travel (Wales) Act and other progressive measures.

The Government relies heavily on all local authorities, enthusiastic or not, to provide for active travel on the ground and locally. Every one of them needs a solid steer and to be assured of the resources to go with it. Regrettably, though, the NTDP falls short in both respects.

If the above problems are not addressed, Cycling UK fears that Wales will not be taking a 'new path'. Instead, the nation risks drifting back to the old path, suffering from all

the environmental and social detriment associated with the relentless growth of motor traffic and the inability to persuade enough of the population to change their habits and travel more sustainably.

Delivery

Overall, we think the Plan overuses terms such as “explore”, “consider”, “investigate”, “look at/for”, “encourage” or “support”, and is woefully short of “**will deliver**” (and, as we discuss later, robust timescales for delivering). This is not only surprising for a “delivery” plan which claims to be “turning strategy into action” (heading, section 2), but deeply worrying.

By way of example (all bolding is ours):

- Llwybr Newydd states that the Government **will** “develop a framework for fair and equitable road-user charging”. In NTDP, however, the original commitment becomes more of an exploration: “We will **explore** a ‘benefits and charges packages’ approach to introducing any new schemes, **looking at** ways to improve services before charges or introduce lower fares when charging starts.” (3.2.2.5). (We discuss road user charging further in our response to Q2).
- The Plan says: “Further work will [...] **consider** other alternatives such as work place car parking levies and road space reallocation.” (3.3.3). Only *considering* something as vital as road space reallocation (i.e. giving people more space to walk, wheel and cycle in safety) is a markedly weak undertaking.
- The Plan says: “We will be **looking for** opportunities within the streetscape to improve the infrastructure for other forms of sustainable transport and **considering** whether vehicle through traffic should be restricted or removed to provide a safer environment.” (4.1.4.2). Again, restrictions on through motor traffic – another measure that gives active travel a boost – deserve more than merely “considering”. The measure comes across as a much stronger prospect in Llwybr Newydd where supporting “... more space for walking and cycling through closing roads for vehicle traffic” is one of the stated priorities in the original active travel mini-plan.
- The Plan is equally limp on workplace measures, saying: “We will also **consider** ways we can **support** and incentivise employers to aid the implementation of enhanced workplace infrastructure such as cycle parking, equipment storage and shower or changing facilities.”(4.1.4.6).
- Similarly, the reference to active travel school plans – another pivotal yet simple initiative – completely lacks drive: “... it is our ambition to **encourage eventually** all schools to produce active travel school plans for their pupils, parents and staff.” (4.1.4.6).

The above extracts illustrate another problem with the NTDP: the overly frequent ambiguity over who it means by “we” or “our” (for more on this, please see our comments under ‘Governance, monitoring and accountability’ below).

RECOMMENDATION: The Plan should be revisited to ensure that it firmly commits to the active travel measures it describes, rather than merely exploring, considering and encouraging (etc.) them. This would help ensure that it reverts to its original, core purpose, i.e. delivery.

RECOMMENDATION: The Plan should also identify who exactly is tasked with delivering what, by when.

The liquid definition of the ‘sustainable transport hierarchy’

The ‘sustainable transport hierarchy’ is generally accepted to mean prioritising walking and cycling, then public transport over the private car, and we very much welcomed Welsh Government’s decision to adopt it.

Indeed, Llwybr Newydd reflects the widely understood definition of the hierarchy by stating that it “guides decisions about new infrastructure and gives priority to walking and cycling and public transport, followed by ultra-low emissions and finally private vehicles. It is set out in Planning Policy Wales (PPW) 11”.

PPW 11 refers to the hierarchy thus:

“4.1.12 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. [...]

“4.1.13 The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.

“4.1.14 The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.”

Yet the NTDP offers a new definition which does not give walking and cycling priority but, instead, states in Annex 1 - Useful terms (our bolding):

“ Sustainable Transport Hierarchy - Guides decisions about transport investment. **It gives priority to maintaining, managing and future proofing existing infrastructure.** Where new infrastructure is needed, it gives priority to walking and cycling and public transport followed by ultra-low emissions vehicles and finally private vehicles. It is set out in Planning Policy Wales (PPW).”

Likewise, the NTDP says: “An important part of our Sustainable Transport Hierarchy is making sure we make best use of the infrastructure we already have and target enhancement to this.” (4.4.6.4).

Put frankly, the hierarchy does not prioritise “maintaining, managing and proofing existing infrastructure”. Not only does this choice of wording distort the concept, but it also allows for major investment in increasing the capacity of the existing road network through, for example, road-widening schemes.

For the vision of Llwybr Newydd to materialise, the NTDP needs to make it absolutely clear that major investment should, as a priority, be channelled into sustainable alternatives to the private car.

As for new schemes and the hierarchy, the NTDP thankfully keeps better faith with the accepted understanding: “Where we need new infrastructure, it gives priority to walking and cycling, public transport and ultra -low emissions vehicles over other private motor vehicles.” (1.3.2).

Also, under ‘Legislation and policy reform’, the NTDP states: “As walking and cycling are part of our everyday lives, they are influenced by many of our policies. In all of these the sustainable transport hierarchy means when considering transport, we always consider active travel first.” (4.1.1).

This liquid definition of the hierarchy, however, needs to be cleared up before the drafting of the promised, more detailed “future transport plans” which, it seems ,will cover individual modes and sectors separately. (1.4.4).

RECOMMENDATION: All references to the hierarchy must be amended to mirror the definition given in PPW and Llwybr Newydd.

Timescales

Annex 2 sets out the timescale for a series of programmes, projects and interventions mentioned in the Plan.

Firstly, it is sometimes a challenge to identify which project is being described (or if it is being described at all). This is especially the case, but not exclusively so in the ‘Active Travel’ section, which lacks the enviably fine and advanced detail given, say, for ‘Rail’ and ‘Bus’.

Secondly, the date range in some cases goes beyond the Plan’s five-year life span (2022 to 2027) – we hope that the latter means that the project will endure, not that the start date could be any time at all in the future.

The following highlights the vaguely dated projects that concern us most:

TAN 18

In the body of NTDP, TAN 18 is mentioned several times, with the Government undertaking to review it “in the next 5 years, to take account of the new transport priorities in the Wales Transport Strategy and in Future Wales - the National Plan 2040.” (3.1.3).

Oddly, though (and unlike TAN 11), TAN 18 is missing from Annex 2.

While Cycling UK strongly supports the intention to update the outdated guidance, we are dismayed both by the vagueness of “in the next 5 years” and its non-appearance in

Annex 2. TAN 18, after all, is pivotal for realising Welsh Government's laudable desire to ensure that "...new developments are designed to be walking and cycle-friendly from the outset". It is true that Planning Policy Wales is powerful, but it needs TAN 18 to reinforce it.

We therefore urge the Government to prioritise TAN 18, review and update it without delay, and adjust the timescale assigned to it in NTDP accordingly.

Otherwise, Cycling UK is pleased to see the NTDP's generally sound thinking on avoiding the creation of car-based developments outlined in Priority 1, believing this to be a sound basis for the revision. In passing, though, we recommend that the developing parking policies "to drive modal shift to public transport and active travel" is linked into it. (4.4.1.2/ Annex 2 S&P 8).

Road Safety Framework

Annex 2 gives a date range of 2022 to 2024 for updating the Road Safety Framework.

The existing 2013 Framework, now outdated, expired in 2020. This makes it all the more troubling to learn that we may still have to wait another two years for the next issue to appear, despite many promises to the contrary. After all, a robust Road Safety Framework (RSF) is crucial to the modes the Government wishes to encourage above all – walking and cycling.

While these modes are much safer than many think, their health benefits far outweigh the risks and they pose negligible risk to others when compared to driving – so should never be considered 'dangerous' – pedestrians and cyclists are disproportionately represented in road casualty figures:

- Although cycling in Wales typically accounts for only about 1% of traffic, 9% of KSIs in 2021 were cyclists.

Figures such as this, the experience of cycling on hostile roads, and even just the thought of it, act as a deterrent:

- A YouGov survey commissioned by Cycling UK found that, when asked what would put them off ever cycling in the UK, more than half of our respondents in Wales selected 'Drivers overtaking too closely to me', 'Having to share the road with lorries and other large vehicles' and 'Having to cross busy junctions and roundabouts with other vehicles'.

Surely, these findings, plus the need to galvanise Wales' 'Vision Zero' approach and ensuring that the RSF complements the Government's work on "active travel, roadspace, reallocation and speed limits" (3.2.4.10) makes reviewing the Framework a top delivery priority.

As Cycling UK said when commenting on the draft Llwybr Newydd, we need more detail on, for example:

- **Strengthening the enforcement of road traffic law.** Through its partnership working, Welsh Government should encourage the police to strengthen enforcement of road traffic law (to tackle bad driving). In particular, anti-speeding awareness campaigns, backed up by enforcement, will help ensure that introducing a default 20 mph speed limit on restricted roads is a success and the messaging clear.
- **Road casualty reduction targets.** It's worth mentioning here that these targets should be 'rate-based', measuring progress on the risk of cycling. This is because simple targets based on absolute numbers create a perverse incentive for practitioners to reduce casualties by discouraging cycling. Given that the health benefits far outweigh the risks, suppressing the activity would prove counter-productive in public health terms, almost certainly shortening more lives than it could save. Targets should therefore aim to reduce the **risk** of serious and fatal cycling injuries **per mile travelled, or per trip** (so it's a sign of success if cycle mileage rises more steeply than casualties).
- **Safer lorries**, especially introducing a Direct Vision Standard for HGVs so that drivers have a better view of people outside their cab (TfL's scheme is a good model).

With road safety largely absent from both the Strategy and the Delivery Plan, revising the expired RSF should be treated as a matter of urgency.

Specific delivery plan for active travel

In its June 2022 review, the Cross-Party Group on the Active Travel Act (CPGATA) made several recommendations, but above all it advised "the establishment of a new National Delivery Plan for Active Travel in Wales, to be in place by the end of 2022."

We will not repeat the detail here, but strongly support CPGATA's calls for such a delivery plan because, unlike NTDP which covers all modes, it would focus attention on Llwybr Newydd's top priority.

We note that NTDP says: "Following on from the WTS, we are working on a range of other more detailed plans relating to individual transport modes and sectors". (1.4.4).

Mention of a detailed delivery plan for active travel, however, is not apparent in Annex 2. This omission needs to be addressed, and the work assigned a date in the near future.

Promotional toolkit

The NTDP promises a "promotional toolkit in the active travel act guidance for local authorities to promote active travel alongside implementation of 'hard' infrastructure." (4.1.4.6). We have been waiting for this toolkit for about a decade, i.e. much longer even than we've been waiting for the review of the expired RSF.

Again, this should be delivered as a priority because Welsh Government needs to emphasise to all local authorities exactly how important promoting and enabling active travel is to Wales.

Also, it is not clear in Annex 2 whether AT15 “Develop travel plan guidance and toolkit” is actually referring to the long-promised promotional toolkit. This needs to be clarified.

National Travel Survey

Cycling UK is pleased to note the intention to introduce a new National Travel Survey (NTS) for Wales.

Since the DfT’s NTS stopped covering Wales a decade ago, travel data for the nation have been so limited that it compromises efforts to monitor progress on active travel (the National Survey for Wales being no substitute). A new NTS is therefore long overdue, and is crucial to a nation that has adopted pioneering legislation such as the Active Travel (Wales) Act and is committed to a vision of modal shift.

We are not sure, however, whether “WTS Monitoring Baseline data publication” (NTDPM 6, Annex 2) is indeed referring to the new NTS. Again, this needs to be clarified. We assume it is referring to the NTS but, if it isn’t, the NTS should certainly be listed in the Annex by name, and assigned a date that reflects its urgency.

Transport grant programmes

The NTDP is scattered with references to grants, but the specific commitment to “modernising” them seems to be left to the “coming years” (2.3.4). Annex 2 mentions (AT 10) that the attention is to “Establish a travel plan support and grants programme”, with a date range of 2022 to 2027 and beyond.

Apart from being a rather vague reference to funding that is essential for active travel, it presents only a hazy idea of when the “modernising” is likely to commence and pay dividends (see also ‘Long-term funding’ below).

Cycle spaces on trains and buses

The undertaking to increase the number of cycle spaces available across the TfW fleet is welcome, as is the ambition to enhance cycle space capacity on buses, although we are disappointed that the latter is only targeted at Trawscymru services. (4.1.4.4).

Both of these measures, however, need to be specifically listed in Annex 2, and supplied with a firm ‘by when’ date. (“Bus 29” appears to cover this, but not specifically).

Cycling UK believes it is important to expedite and refine the NTDP’s proposals for integrating cycling with public transport, not least because it is a good way of “Extending the geographical ‘reach’ of public transport in rural Wales” (Annex 3, Rural Pathway) but, in many areas, it is bus and not rail that provides the nearest service.

While on the subject of public transport, we recommend that:

- The section on new rolling stock refers to designing in cycle space from the outset. (4.3.4.4).
- Cycle parking initiatives are extended to bus stops (3.2.3.4).

RECOMMENDATION: The draft NTDP needs to be combed again to make sure that all the undertakings for active travel appear explicitly in Annex 2, and that they – and the projects already listed – are assigned a tight date range that reflects how important walking and cycling are to Llwybr Newydd. This applies especially to: TAN 18; the Road Safety Framework; a delivery plan specifically for active travel; the promotional toolkit; grants for active travel; and increasing cycle space on public transport.

RECOMMENDATION: The draft NTDP should refer to designing in cycle space on new rolling stock from the outset.

RECOMMENDATION: Cycle parking initiatives related to public transport should be extended to bus stops.

Long-term funding

The NTDP outlines funding sources (2.2) and is at pains to explain why an “absolute capital and revenue commitment” is not possible for the term of the Plan. (2.2.2).

While appreciating the difficulties posed by reduced funding from the UK Government (2.2.3), Cycling UK urges Welsh Government to reflect its stated commitment to active travel by ensuring that adequate funding is available not just for the duration of the Plan, but beyond it.

That said, Cycling UK commends the Welsh Government’s decision to invest £75million in active travel, making its spend per head of population higher than in any other UK nation at the time. Likewise, we are pleased to see the NTDP promising to increase the Active Travel Fund “further in future years” and to keep funding the development of Active Travel Network Maps’ (3.2.2.1) – an initiative, of course, that needs to translate into best-practice infrastructure on the ground.

Local authorities’ delivery on active travel, however, cannot survive on promises. They must be firmly assured of long-term, adequate and sustained funding not just for infrastructure (capital), but also so that they can invest in boosting the skills and capacity required to deliver high-quality schemes and networks.

Consequently, Cycling UK advocates investing at least 10% of the overall transport budget in active travel.

We also recommend CPGATA’s advice on funding, set out in its above-mentioned June 2022 review, especially: investing in workforce development/best practice sharing; revenue funding; setting compliance with the requirements of the Active Travel Act and guidance as a condition of funding; and making central funding for new and re-developed schools dependent on incorporating an effective package of active travel measures. We discuss these further below.

Skills and capacity

In its review, CPGATA says: “Whilst systems need to be improved, the real solution lies in investing in developing the capacity and expertise of [...] local teams, with increased

funding and status for staff and a comprehensive training programme that also offers a greater understanding of active travel to other teams in the public, private and third sector.”

Cycling UK agrees that this is essential, given the key role that local authorities and, vitally, other partners too, play in delivering the Government’s objectives on modal shift.

Clearly, local conditions for active travel need to be transformed to support active travel, and transformed with understanding and in accordance with best practice. For this reason, we believe that the NTDP’s undertaking to “further enhance the capacity and skill base in TfW to support the delivery of active travel schemes” (4.1.4.2) needs to encompass local authorities as well.

Yet, while the NTDP highlights the importance of enhancing “skills and capacity” and describes some excellent associated measures, it is not explicit about how this will be resourced in the long-term or proofed against changes in, say, political administration.

This is a major concern. If long-term funding remains uncertain – not just for training programmes but for the infrastructure schemes that the resultant practitioners will want to implement (see above) – even enthusiastic local authorities may lose heart over putting much effort into active travel at all.

In turn, this again highlights the importance of sufficient revenue funding alongside capital funding, something we also raise in our response to Q3 on behaviour change campaigns below.

Savings from the Roads Review

The NTDP is similarly and rather worryingly vague about the commitment to “... reallocate any saving from schemes subject to the Roads Review to deliver more sustainable forms of transport and maintain and renew existing assets”. (3.2.2). On the face of it, this seems like an admirable plan, but it needs to be specific about exactly where the savings will go and what proportion will be allocated to active travel.

Highway investment priorities

Investment priorities for the highway network should, surely, list active travel as an investment priority. (4.4.2.1).

Funding and substandard infrastructure

With regard to substandard infrastructure, we mentioned in our response to the draft Llwybr Newydd that we could see a role here for TfW here as an inspectorate with the power to withhold funding should a scheme fail to comply with the Active Travel Act guidance on infrastructure design. (See also ‘Governance’ section below).

Other funding streams: health and highway maintenance

Disappointingly, the NTDP is not at all expansive about integrating active travel and health, despite Llwybr Newydd saying “we will [...] work with colleagues in the health sectors to better integrate planning for health and transport.”

This deficiency could be partly remedied by referring to public health funding streams and tapping into them. As a preventive measure, active travel is surely an appealing investment in this respect, with Wales’ high levels of physical inactivity among adults and children, and the high costs of treating the ill-health that results from it. (See also ‘Gaps’ below).

Another regularly funded activity that could be used to enable active travel is planned highway maintenance. Apart from repairing hazardous defects, resurfacing a road is a good opportunity to render it more pedestrian and/or cycle-friendly in other ways, e.g. by adding coloured surfacing, or traffic wands or planters to create segregated cycle lanes, while the work-gang is on site anyway. This should be specified under ‘Investment priorities for the highway network’ (4.4.2.1).

RECOMMENDATION: With active travel the top priority in Llwybr Newydd, the Government should firmly commit at least 10% of its transport budget to active travel for the duration of the NTDP and beyond, and look to increasing this investment as capacity, expertise and the popularity of walking and cycling increases.

RECOMMENDATION: Funding should be assured for developing the capacity, expertise, understanding and status of all staff involved in delivering on active travel (e.g. in TfW, local authorities and relevant teams in other sectors).

RECOMMENDATION: NTDP needs to specify where the savings from the schemes subject to the Roads Review will go, and in what proportion.

RECOMMENDATION: Investment priorities for the highway network should list active travel.

RECOMMENDATION: Consideration should be given to assigning a supportive inspectorate role to TfW, with the power to withhold funding should a scheme fail to meet best practice standards.

RECOMMENDATION: The Plan should also refer to other non-transport streams of funding that could, potentially, help enable active travel (e.g. public health and highway maintenance).

RECOMMENDATION: CPGATA’s recent review (June 2022) of the Active Travel Act makes a series of recommendations on funding, all of which should be seriously considered.

We note that WeITAG 2022 is currently subject to a separate consultation, so will leave our thoughts on that for our response.

Governance, monitoring and accountability

The NTDP is light on detail about governance, roles, relationships and monitoring and, in consequence, accountability (2.4).

We have already mentioned a persistent vagueness over who the NTDP means by “we” or “our”. As we understand it, the draft NTDP has been prepared by TfW, but it is often not clear whether an action point refers to TfW or Welsh Government. Further, the tasks we assume to be in TfW’s remit appear rather more fleshed out than those we assume would be matters for Welsh Government (e.g. legislation and policy reform).

We therefore suggest clarifying the relationship between the Welsh Government, TfW, local authorities and other stakeholders. The duties of Corporate Joint Committees, and what they mean for active travel, are also unclear.

As Cycling UK suggested in our response to the draft Llwybr Newydd:

“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.”

Collaboration with stakeholders

On a point pertinent to ‘relationships’, we see little if any mention of collaboration with other sectors in planning, built environment, health, environment, recreation, tourism and education.

Equally, references to the ‘third sector’ focus almost exclusively on the services it provides (e.g. community transport). The Plan omits to suggest that voluntary organisations can also offer expertise on active travel policy, infrastructure, behaviour change and issues specific to local communities (and more).

In Wales, as elsewhere, a wide range of organisations and groups, including the voluntary sector, national and local, are stakeholders in transport policy, the decision-making process and delivery. Some, but not all, are directly involved in transport, while others may not work specifically in the Welsh context. Nevertheless, each could offer insight and expertise to help Wales formulate, develop and drive forward its transport vision, ambitions and priorities.

Monitoring framework

This section (2.4.3.1) seems very light on detail.

Assessing progress on Llwybr Newydd, the Active Travel (Wales) Act, the measures mentioned in the NTDP (and the measures that Cycling UK would like to see included in the NTDP) is crucial. Consequently, the section needs to be fleshed out and given more urgency than it appears to have in the Plan.

National Transport Performance Board

This board needs an active travel appointee with an independent voice, a representative ('critical friend') who does not hail from an organisation contracted by Welsh Government or TfW to deliver services.

RECOMMENDATION: The NTDP needs to be far more explicit about governance, roles, relationships, accountability, and monitoring.

RECOMMENDATION: Detail on actions that could reasonably be expected of the Government needs to be pursued so that it can be written up and published in the NTDP.

RECOMMENDATION: The NTDP should refer to collaboration with other sectors, including Welsh Government departments in planning, built environment, health, environment, recreation, tourism and education.

RECOMMENDATION: In particular, to reap the huge benefits offered by active forms of transport, the Plan should embrace the need to integrate health with transport planning more fully.

RECOMMENDATION: The Plan should specify that the Third Sector has expertise to offer on active travel policy, infrastructure, behaviour change and issues specific to local communities (and more).

RECOMMENDATION: The National Transport Performance Board should appoint a member with an independent voice on active travel.

RECOMMENDATION: All relevant stakeholders (both in and beyond the transport sector, voluntary and otherwise) should be identified and invited to help build on and deliver Llwybr Newydd's vision.

Gaps

Inclusion and equality

Equality heads one of the delivery pathways, and Llwybr Newydd covered it under the well-being ambition 'Good for people and communities'. Yet, while it and inclusion seem to be relatively well-considered under public transport, they are only sparsely mentioned under active travel in the NTDP.

This is perhaps one of the most glaring gaps overall. The needs of those less physically able, and all groups who are under-represented in cycling (e.g. women, ethnic minorities and the elderly), ought to be factored into all delivery planning.

By way of example:

- Cycle parking, or spaces on public transport services, should cater for non-standard cycles too.
- Following consultation and partnership, the behaviour change programme should ensure that it is as inclusive as possible.
- Increased active travel helps reduce air and noise pollution, both of which affect people's quality of life and health.
- 'Cycling on prescription' schemes deserve not only a mention, but also details on delivering them (it is one thing to envisage such schemes, but considerably more difficult to put them into operation).

That said, we are pleased to note that in developing future cycle hire schemes, there are plans for a "review of the opportunities associated with the inclusion of standard, electric-assist and adapted cycles." (4.1.4.5).

We are also pleased that the NTDP addresses the belief, held by some, that road user charging is inequitable. (Annex 3). We agree that it isn't and that "...charging that supports improving non-car modes is progressive and supports those on lower incomes." (For more on road user charging, please see our comments on Q2).

We also cover health under 'Long-term funding' above.

Health and Education

As discussed above, the Plan barely refers to collaboration between Transport and Health Departments (national and local). But, surely, encouraging and enabling healthy active travel is a project that should be explicitly shared by both of them. Prescribing active travel, for example, needs to be mentioned specifically.

The link between the remits of Transport and Education Department(s) is also far too low-key. If anyone needs to be encouraged and enabled to travel more actively and sustainably it is schoolchildren and young people – whose future wellbeing is, rightly, a cause of serious concern to the Government.

We have already noted the NTDP's lack of drive over active travel plans for schools – a five-year wait for these is far too long (see 'Delivery' above).

While on the subject of schools, we must say that we are equally disappointed by the Plan's weak reference, in 4.1.1.2, to Llwybr Newydd's commitment to "put in place a policy framework that ensures that all new developments, including new school and health facilities, make provision for walking and cycling from the outset". (Priorities, 7.1). (On new schools, 4.1.1.2 merely says: "Many active travel schemes are delivered through the planning process which aims to ensure that active travel infrastructure is included as a core part of new developments, including health facilities and future

school building programmes, through the implementation of Planning Policy Wales 11.”).

Rights of way network

As Cycling UK mentioned in our response to the draft Llwybr Newydd, we agree that there is a distinction between everyday active travel, and walking and cycling for exercise, leisure and recreational purposes. We also said, however, that it is misguided to make a clear-cut distinction between the purposes of the (predominantly urban) active travel and the (predominantly rural) rights of way networks.

Active Travel Networks would be all the better for integrating rights of way, helping to “deliver routes that link rural communities to services and facilities in the nearest town” (4.1.4.1).

In ‘urban fringe’ areas particularly, off-road walking and cycling routes can facilitate everyday journeys from outlying settlements into town (e.g. children travelling between school and home), while they also offer families, for instance, access to the surrounding countryside for fun and exercise on foot or by cycle.

Not only this, but making it easier for citizens and tourists to visit the Welsh countryside by walking or cycling feeds into two of the well-being ambitions which the NTDP seeks to fulfil:

- ‘Good for places and the economy’ (by tackling car-dependent tourism, a burden for people who live or work in or around popular destinations such as national parks; and boosting the revenue from active travel tourism); and
- ‘Good for culture’ (by introducing more people, in a sustainable way, to the stunning and precious Welsh landscape and its national parks).

Further to the visitor economy, branded long-distance routes appeal to tourists.

Disappointingly, Llwybr Newydd did not capture the point about blending the rights of way and ‘active travel’ networks, and nor does the NTDP. It is not too late, however, for it to be threaded into the delivery plan because maximising the dual purpose of rights of way for active travel is bound to contribute to delivering the Strategy’s key goals and benefit the ‘Rural Pathway’ (Annex 3).

Expediting access reform, which has been on Welsh Government’s agenda for some time now, is highly relevant here, of course, as is enhancing and signing useful off-road routes, and working in partnership with rights of way officers, Natural Resources Wales, local access fora and other bodies responsible for outdoor access.

Other gaps:

There is no (or little) mention of the following (listed in no particular order):

- Pedicabs (under taxis & PHVs)
- The carriage of cycles, where practical, in taxis and private hire vehicles

- Using scrappage schemes to support active travel (please see our response to the draft Llwybr Newydd for more on this)
- Cycle parking at bus stops
- Support for local authorities to provide public and on-street e-bike charging facilities (see also our comments on EV charging under Q3 below).

RECOMMENDATION: The Plan should feature inclusion and equality far more emphatically in the context of active travel.

RECOMMENDATION: The Plan should recognise how crucial Health and Education (i.e. national and local services and departments) are to achieving modal shift, so both should figure far more prominently.

RECOMMENDATION: ‘Cycling on prescription’ schemes should be mentioned specifically.

RECOMMENDATION: Active travel plans for schools should be developed as a priority, and all new and refurbished schools designed to cater for walking, cycling and wheeling from the outset.

RECOMMENDATION: With access reform promised but now, we think, overdue, rights of way must be integrated into active travel networks, helping to deliver on sustainable travel and tourism as soon as possible.

RECOMMENDATION: The Plan should include commitments to: pedicabs, carriage of cycles in taxis & PHVs, scrappage schemes that support active travel, cycle parking at bus stops and e-cycle charging facilities.

Q2: Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

- very positive
- positive
- neutral
- negative
- very negative

Please provide comments and reasons for your response here:

It is clear from the ‘Integrated Sustainability Appraisal’ that the NDTP as drafted will not lead to a significant reduction in greenhouse gas emissions (GHG) from transport,

despite its commitment to active travel and improving public transport. (For more on this, please see our response to Q7).

As mentioned under Q1 above, however, the commitment to public transport comes across as considerably more detailed in terms of delivery than the Government's plans for walking and cycling – modes which are, arguably, about the closest it is possible to get to zero-carbon transport.

For the Welsh Government to convince Cycling UK that the NDTP can genuinely reduce GHGs, it will have to revisit the detail and timescales assigned to projects, programmes and initiatives for walking and cycling; and plug the gaps (see our comments under Q1 above).

We are highly concerned to note that, although the Plan often mentions reducing car mileage and a shift away from the private car (and even 'demand management'), it does not refer explicitly to the target, published last October in Wales' Carbon Budget 2 (2021-25), to "reduce the number of car miles travelled per person by 10% by 2030". Yet, oddly, the Plan does cite the accompanying targets to increase the proportion of trips by public transport, walking and cycling to 35% by 2025 and 39% by 2030.

A target to reduce motor traffic and targets to promote modal shift are two sides of the same coin, so there seems little sense in quoting one but not the other in the NDTP. In effect, omitting to mention the car miles target isolates it under decarbonisation and climate change and, bizarrely, forgets about it when it comes to delivering on transport. This is hardly helpful.

Indeed, as Cycling UK said in its response to the draft Llwybr Newydd, reducing motorised road traffic for numerous reasons (including tackling carbon emissions), must be THE central measure of progress in any robust transport strategy and plan to deliver it. The current draft NDTP fails to do this, and therefore requires substantial amendment.

RECOMMENDATION: The NTDP should refer to the car miles reduction target (but see also our response to Q7).

Q3: To what extent, within the funds available, do you think the plan will meet the headline 5-year priorities set out within Llwybr Newydd: The Wales Transport Strategy 2021?

- fully
- partially
- in a limited way
- not at all
- unsure

Please provide comments and reasons for your response here:

If Welsh Government addresses our concerns mentioned in answer to the questions above and below, we feel Wales' chances of meeting its headline 5-year priorities would be much improved. For now, however, we can only remain 'unsure'.

A few notes on each priority follow:

Priority 1: Bring services to people in order to reduce the need for people to use their cars on a daily basis

- The section on transport and **new developments** (3.1.2) is admirable, much of it summarising Planning Policy Wales. It must, however, be reinforced by a speedy review of TAN 18 – 'in the next 5 years' is far too long to wait. (Please see our response to Q1).
- Incidentally, when responding to the draft Llwybr Newydd, Cycling UK argued that the wording of this Priority assumes that car ownership is, and will remain, the norm. We therefore suggested replacing the concluding words with: "... so that people need to use cars less." Although the original wording was not changed, we still think that the NTDP needs to acknowledge this point clearly in the text.

Priority 2: Accessible, sustainable and efficient transport services and infrastructure

- As mentioned in our response to Q1, we take serious issue with the definition of the '**Sustainable Transport Hierarchy**'. We stress again that this does not start "with managing and maintaining our existing infrastructure". (3.2).
- We are pleased to see that the **Active Travel Fund** will be increased in future years (3.2.2.1), although we would appreciate firmer details of funding overall – see our response to Q1.
- We are, however, unhappy to learn that Welsh Government intends, timidly, to leave introducing equitable **road user charging** to local authorities (3.2.2.5). This is a pity because a demand management measure of this kind could prove an important source of funding for active travel in Wales and, at the same time, make people think twice about driving. The resolve and courage to implement road user charging must come from the top.

This does not mean, however, that we disagree that "local schemes could [...] provide funding for improvements in public transport and active travel as the local authority would receive the revenue". **Clean Air Zones**, which receive a rather tardy mention at 4.4.5.4, could certainly provide revenue for clean, active travel through emissions-based charging. This is a particularly equitable idea as research repeatedly shows that people living in disadvantaged areas are disproportionately affected by transport harm (e.g. from pollution and road danger), and 'transport poverty'.

The revenue from charging schemes could, potentially, be invested in walking,

cycling, road safety and streetscape improvements; better public transport services; public hire-bike schemes; training / employment for local people to maintain and manage the public hire-bike fleets; and programmes to introduce people to cycling.

- **EV charging** (mentioned in 3.2.4.8 & 4.4.5.3) is very car-centric, especially for a strategy that aims to reduce car mileage and shift the population towards active travel.

Providing for 'green' cars is hardly the solution to congestion, road safety nor arguably, to decarbonisation (i.e. if the energy does not come from renewable sources) or sustainability (given the issues surrounding the materials needed for batteries and the manufacturing process).

It is much better to facilitate active travel which means, at the very least, providing charging infrastructure for e-bikes and e-cargo bikes, and dictating that it should not, in any way, impede people on bike or foot.

- Cycling UK strongly supports **integrated ticketing and easing the switch between different types of sustainable modes** (3.2.3.3), but stresses the need for a streamlined process for booking bike spaces on trains. In our experience, the systems involved are by no means always user-friendly and can lead to major frustrations with journey planning and sustainable, multi-modal trips.
- As mentioned in our response to Q1 above, we urge the Government to expedite the promised review of the **Road Safety Framework** (3.2.4.10).

Priority 3: Behaviour change

- Cycling UK is pleased to see the NTDP referencing the **COM-B model of behaviour change**. This is, in fact, the model we use in our behaviour change programmes.

Again, though, this section and, indeed, the NTDP as a whole, is not forthright enough about the link between transport and health.

It's crucial, we think, to focus on local communities and support them to make positive changes to their travel habits. This is important everywhere, but people living in disadvantaged areas number among those most likely to be: under-represented in cycling and active travel; affected by poor air quality, road danger and transport poverty; and at risk from health inequalities.

Behaviour change initiatives therefore need to be tailored to respond to local needs, an intervention that is likely to be more effective than a one-size fits all, Bikeability-style approach.

We would also like to see the behaviour change programme expanded to include training and support for employers and employees, given that the

workplace is one of the touchpoints for rethinking travel habits (a new job may trigger this, for example).

Finally, the behaviour change programme needs to be: supported by sufficient revenue funding to complement capital schemes; and carefully monitored and evaluated, with the insight shared among stakeholders.

- While Cycling UK support efforts to tackle **pavement parking**, we are concerned that the current proposals effectively pass responsibility to local authorities, all too many of whom, we fear, may not have the determination to act.

It therefore remains unclear if this arrangement will lead to effective and widespread enforcement against a serious problem even if, as the NTDP implies, councils should in theory be answerable to their residents, being expected “to publish their policies to inform their communities of their local approach to enforcement, dealing with local circumstances.” (4.4.5.2).

- Guidelines on school-based **safety training** (3.3.2) need to make sure that they avoid ‘dangerising’ walking and cycling, and never promote the unethical message that the onus is on children to protect themselves from drivers.

Drivers must be trained about the ‘Hierarchy of Users’, now embedded in the Highway Code.

This concept “... places those road users most at risk in the event of a collision at the top of the hierarchy. The hierarchy does not remove the need for everyone to behave responsibly. The road users most likely to be injured in the event of a collision are pedestrians, cyclists, horse riders and motorcyclists, with children, older adults and disabled people being more at risk.”

Rule H1 says: “Everyone suffers when road collisions occur, whether they are physically injured or not. But those in charge of vehicles that can cause the greatest harm in the event of a collision bear the greatest responsibility to take care and reduce the danger they pose to others. This principle applies most strongly to drivers of large goods and passenger vehicles, vans/minibuses, cars/taxis and motorcycles.”

- We are pleased to see plans for introducing **Bikeability National Standards** into Wales, but believe they should refer not just to the consistency of cycle training delivery, but to the volume of it (a target to reach all children would be useful here). We very much support plans to expand training outside school, integrating it with behaviour change schemes in communities and workplaces.

RECOMMENDATION: The Government should not leave introducing equitable road user charging to local authorities. The resolve and courage to implement road user charging must come from the top.

RECOMMENDATION: Revenue from local charging CAZs should be invested in active and sustainable modes of transport.

RECOMMENDATION: EV charging schemes should cater for electrically assisted cycles (including e-cargo cycles). No EV charging infrastructure should impede the passage of people on foot or cycle.

RECOMMENDATION: Booking cycle space on public transport should be a streamlined and customer-friendly process.

RECOMMENDATION: Behaviour change should be more emphatically linked to health, inclusion and workplaces, and ensure that it is tailored to respond to local needs.

RECOMMENDATION: The behaviour change programme needs to be: supported by sufficient revenue funding to complement capital schemes; and carefully monitored and evaluated, with the insight shared among stakeholders.

RECOMMENDATION: The Government should not pass all responsibility for tackling pavement parking to local authorities

RECOMMENDATION: Safety training for children should not dangerise cycling or promote the message that the onus is on them to protect themselves from drivers.

RECOMMENDATION: Drivers should be made aware of the changes to the Highway Code, especially the 'Hierarchy of road users'.

RECOMMENDATION: A target to reach all children with Bikeability training should be set.

Q4: To what extent, within the funds available, do you think the plan will meet the well-being ambitions set out within Llwybr Newydd: The Wales Transport Strategy 2021?

- fully
- partially
- in a limited way
- not at all
- unsure

Please provide any further comments here:

As with Q3, we feel that if Welsh Government addresses the concerns mentioned in our responses to the questions above and below, Wales' chances of meeting Llwybr Newydd's well-being ambitions will be much improved. For now, however, we can only remain 'unsure'.

We comment elsewhere on matters relevant to this question:

“Within the funds available”. Please see ‘Long-term funding’, Q1.

Good for people and communities – “A transport system that contributes to a more equal Wales and to be a healthier Wales”. Please see our comments on:

- Inclusion & equality / health & education (‘Gaps’, Q1).
- A correct understanding of the ‘Sustainable Transport Hierarchy’ (Q1).
- Road Safety Framework review (the need for this to address the fact that cyclists are disproportionately represented in road casualty statistics) (Q1).
- The Highway Code’s ‘Hierarchy of road users’ (the need to address the imbalance in risk) (Q3, Priority 3).
- Tailoring behaviour change to local communities (Q3, Priority 3).

Good for the environment – a transport system that delivers significant reduction in GHGs [...]. Please see our comments on:

- Greenhouse gas emissions and the car miles reduction target (Q2 & Q7).
- Road user charging / revenue from CAZs (Q3, Priority 2, & Q7).

Good for places and the economy / good for culture. Please see our comments on:

- Making better use of the rights of way network for active travel (e.g. boosting tourism, and incentivising residents and visitors to explore the Welsh landscape and national parks) (Gaps, Q1).

Q5. To what extent, within the funds available, do you think the plan will meet the 5-year priorities set out within each of the modes and sectors mini-plans in Llwybr Newydd: The Wales Transport Strategy 2021?

- strongly agree
- agree
- neutral
- disagree
- strongly disagree

Please provide any further comments here:

Cycling UK cannot predict the extent of this, given our reservations about the NTDP as drafted. We therefore remain 'neutral' for now.

We have already commented on several matters mentioned in the 'Active travel' and 'Roads, Streets and Parking' mini-plans and identified them by quoting the relevant section number, so will not repeat them here.

Aside from this, we stress that any mention of **e-scooters** under 'active travel' in the mini-plan and elsewhere should make it clear that these vehicles are not, in fact, an active travel mode. (4.1.1).

Rail mini-plan

The reference to the level crossing strategy should specify that safety interventions must guard against severing routes used by walkers and cyclists, and avoid creating diversions that make trips longer. If crossings are closed, convenient alternatives should provide for active travel. (4.3.2.1).

RECOMMENDATION: The NTDP should recognise that e-scooting is not active travel.

RECOMMENDATION: Interventions to improve safety at level crossings should guard against severing active travel routes and creating lengthy and inconvenient diversions.

Q6: Do you think the plan provides the right balance between the modes and sectors to meet the Welsh Government ambitions set out in Llwybr Newydd: The Wales Transport Strategy 2021?

The strong emphasis on walking and cycling is welcome but Cycling UK is not confident that the vision for it will be realised unless the Plan is amended as we suggest.

In particular, it is clear that the continuing reluctance to disincentivise private car use will obstruct the draft NTDP's ambition to reduce GHG emissions from transport (see response to Q7, below).

Q7. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

Yes - BUT the most important issue identified by the Integrated Sustainability Appraisal report (ISA) (apparently in March 2022) seems to have been completely ignored. This is so serious an omission that it has the effect of challenging the entire thrust of the NTDP.

To explain:

- Table 3-5 in the ISA shows the rated cumulative effects assessment summary. The rating against Objective 6 (GHG emissions) is “a range of positive and negative outcomes”.
- The comment (Table 3-6, p73) is “Overall, it is considered that, with a medium level of certainty, the NDTP would result in long term minor positive (not significant) effects on greenhouse gas emissions”.
- Table 3-2 (p55) shows a weak (i.e. not significant) minor positive outcome for Objective 6 against all three WTS Priorities.

This is devastating: the Welsh Government declared a climate emergency on 29 April 2019; more recently it published 'Net Zero Wales' on 21 October 2021; and Wales is subject to legally binding net zero targets by the Environment (Wales) Act 2016.

'Net Zero Wales' demonstrates conclusively (p80) that transport is the third highest emitter of greenhouse gases in Wales (almost all of it CO₂), with cars emitting 55% of transport GHGs – a full 9% of all of Wales' GHG emissions.

Welsh Government has a clear published strategy, enshrined in law and in Llwybr Newydd, to reduce emissions of GHGs to a tight timetable. To now produce a NTDP that is independently assessed to fail to deliver any significant GHG emissions from the transport sector makes no sense at all.

It is crystal clear that the major problem is with cars; decreased car use is crucial to reducing emissions from transport. This fact is properly catered for, with associated targets, in Llwybr Newydd, but it is now quite clear from the ISA that the NTDP does not go far enough to actually deliver on the legally binding commitments already made.

This issue is not adequately addressed even within the ISA – the comments about Objective 6 (p73) are highly misleading, stating that “while the initiatives within the NDTP would be likely to facilitate significant reductions in GHG emissions associated with movements on the road network, there is a risk of this being undermined to some extent by the aviation industry”. This is simply nonsense: according to 'Net Zero Wales' (p80), aviation produces 2% of Wales transport GHG emissions, while road transport produces 86%. Aviation is statistically irrelevant to the challenge – to suggest otherwise is disingenuous.

A fundamental rethink of the NTDP is therefore necessary. It needs to change course significantly, aiming to achieve a 'Strong positive' for Objective 6 to help Wales meet its GHG reduction targets.

Modal shift away from private car use is obviously critical, in accordance with Llwybr Newydd. We have made several recommendations in our responses to questions above that will undoubtedly help Wales make this shift, but highlight the importance in particular of:

- Committing 10% of the entire Welsh transport spend on active travel
- Developing road user charging as a matter of urgency
- Spending the savings from the Road Review exclusively on direct transport decarbonisation measures.

RECOMMENDATION: The NTDP needs to achieve a 'Strong positive' for Objective 6 to help Wales meet its GHG reduction targets. This means that the Plan must change course significantly in the light of the recommendations made above by Cycling UK and, in doing so, deliver on the Government's commitment to modal shift.

Q8. Do you have any further feedback or comments on the plan?

In our responses to the questions above, Cycling UK has made a number of recommendations that we believe the NTDP must take on board to deliver Llwybr Newydd's vision, ambitions and priorities. We recap and group them below:

Delivery and timescales

1. The Plan should be revisited to ensure that it firmly commits to the active travel measures it describes, rather than merely exploring, considering and encouraging (etc.) them. This would help ensure that it reverts to its original, core purpose, i.e. delivery.
2. The Plan should identify who exactly is tasked with delivering what, by when.
3. The draft NTDP needs to be combed again to make sure that all the undertakings for active travel appear explicitly in Annex 2, and that they – and the projects already listed – are assigned a tight date range that reflects how important walking and cycling are to Llwybr Newydd. This applies especially to: TAN 18; the Road Safety Framework; a delivery plan specifically for active travel; the promotional toolkit; grants for active travel; and increasing cycle space on public transport.

The sustainable transport hierarchy

4. All references to the sustainable transport hierarchy must be amended to mirror the definition given in PPW and Llwybr Newydd.

Funding

5. With active travel the top priority in Llwybr Newydd, the Government should firmly commit at least 10% of its transport budget to active travel for the duration of the NTDP and beyond, and look to increasing this investment as capacity, expertise and the popularity of walking and cycling increases.
6. Funding should be assured for developing the capacity, expertise, understanding and status of all staff involved in delivering on active travel (e.g. training for people in TfW, local authorities and relevant teams in other sectors).
7. NTDP needs to specify where the savings from the schemes subject to the Roads Review will go, and in what proportion.
8. Investment priorities for the highway network should list active travel.
9. Consideration should be given to assigning a supportive inspectorate role to TfW, with the power to withhold funding should a scheme fail to meet best practice standards.

10. The Plan should refer to other non-transport streams of funding that could, potentially, help enable active travel (e.g. public health and highway maintenance).
11. The Cross-Party Group on the Active Travel Act's (CPGATA) recent review (June 2022) of the Active Travel Act makes a series of recommendations on funding, all of which should be seriously considered.

Governance, roles, relationships, collaboration, accountability & monitoring

12. The NTDP needs to be far more explicit about governance, roles, relationships, accountability, and monitoring.
13. Detail on actions that could reasonably be expected of the Government needs to be pursued so that it can be written up and published in the NTDP.
14. The NTDP should refer to collaboration with other sectors, including Welsh Government departments in planning, built environment, health, environment, recreation, tourism and education.
15. In particular, to reap the huge benefits offered by active forms of transport, the Plan should embrace the need to integrate health with transport planning more fully.
16. The Plan should specify that the Third Sector has expertise to offer on active travel policy, infrastructure, behaviour change and issues specific to local communities (and more).
17. The National Transport Performance Board should appoint a member with an independent voice on active travel.
18. All relevant stakeholders (both in and beyond the transport sector, voluntary and otherwise) should be identified and invited to help build on and deliver Llwybr Newydd's vision.

Greenhouse gas emissions

19. The NTDP needs to achieve a 'Strong positive' for Objective 6 to help Wales meet its GHG reduction targets. This means that the Plan must change course significantly in the light of Cycling UK's recommendations and, in doing so, deliver on the Government's commitment to modal shift.

Demand management

20. The NTDP should refer to the car miles reduction target.
21. The Government should not leave introducing equitable road user charging to local authorities. The resolve and courage to implement road user charging must come from the top.
22. Revenue from local charging Clean Air Zones should be invested in active and sustainable modes of transport.

EV charging schemes

23. EV charging schemes should cater for electrically assisted cycles (including e-cargo cycles). No EV charging infrastructure should impede the passage of people on foot or cycle.

E-scooters

24. The NTDP should recognise that e-scooting is not active travel.

Equality, inclusion, health and education

25. The Plan should feature inclusion and equality far more emphatically in the context of active travel.
26. The Plan should recognise how crucial Health and Education (i.e. national and local services and departments) are to achieving modal shift, so both should figure far more prominently.
27. 'Cycling on prescription' schemes should be mentioned specifically.
28. Active travel plans for schools should be developed as a priority, and all new and refurbished schools designed to cater for walking, cycling and wheeling from the outset.

Behaviour change

29. Behaviour change should be more emphatically linked to health, inclusion and workplaces, and ensure that it is tailored to respond to local needs.
30. The behaviour change programme needs to be: supported by sufficient revenue funding to complement capital schemes; and carefully monitored and evaluated, with the insight shared among stakeholders.

Rights of way/access reform

31. With access reform promised but now, we think, overdue, rights of way must be integrated into active travel networks, helping to deliver on sustainable travel and tourism as soon as possible.

Public transport

32. The Plan should include commitments to: pedicabs, carriage of cycles in taxis & PHVs, and cycle parking at bus stops.
33. Booking cycle space on public transport should be a streamlined and customer-friendly process.
34. Interventions to improve safety at level crossings should guard against severing active travel routes and creating lengthy and inconvenient diversions.
35. The draft NTDP should refer to designing in cycle space on new rolling stock from the outset.
36. Cycle parking initiatives related to public transport should be extended to bus stops.

Pavement parking

37. The Government should not pass all responsibility for tackling pavement parking to local authorities

Road user training and awareness campaigns

38. Safety training for children should not dangerise cycling or promote the message that the onus is on them to protect themselves from drivers.
39. Drivers should be made aware of the changes to the Highway Code, especially the 'Hierarchy of road users'.
40. A target to reach all children with Bikeability training should be set.

Question A: We would like to know your views on the effects that the National transport delivery plan 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 proposed policy, National transport delivery plan 2022 to 2027, 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 asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please see our responses above.