South West Wales Joint Local Transport Plan - Sustrans Response (Received from Lindsey Curtis 13 Jan. 2015)

Question One – Do you support the Objectives of the draft Local Transport Plan?

Whilst acknowledging timescales were tight to prepare the draft LTP, Sustrans Cymru commented that the vision and objectives could be more ambitious. We stated that specific targets should be included to make the objectives measurable. We raised a specific concern that the vision and objectives of the LTP failed to acknowledge the commencement of the Active Travel Act.

Question Two – Do you support the Long Term Strategy of the draft Local Transport Plan?

We thought that the Long Term Strategy needed to do more in terms of improving travel options for journeys of less than five miles. Whilst acknowledged in the LTP, the Long Term Strategy did not identify the opportunity to improve health and wellbeing through better access and more attractive options for travel. On the point of safety we thought the balance should be shifted to the safety of the user, placing the emphasis on people not mode of transport.

Question Three – Do you support the policies set out in the draft Local Transport Plan?

In general we thought that the policies should set out a greater role for the City Region, especially in relation to developing and implementing priorities for international connectivity. On the City Region we also thought the plan should give more impetus to devolving powers to the regional level for travel policies such as integrated ticketing as we think this should be an important aspiration for all urban areas within the South West.

We think there needs to be stronger links with the provisions in the Active Travel Act. For example the policy on the increasing safety and security should reference the provision for safe and attractive walking and cycling routes set out in Section 1.1. and 1.4 of the Active Travel Act delivery guidance.

At a local level we think the policy emphasis should include an understanding of people's journeys to improve access between key settlements, trip generators and destinations. This would help move away from road first and adding on walking and cycling later as it would consider trips as whole not just by mode.

Question Four – Do you agree with the potential projects (to achieve the Plan objectives) set out in the programmes of the draft Local Transport Plan?

We are in agreement regarding your concerns about regional road schemes and little mention of provision for walking and cycling in these schemes.

As you did we welcomed the list of walking and cycling schemes however we raised concern by the tendency of local authorities to put all active travel schemes under one heading. Raising the point again we believe this is the result of a focus on modes rather than movement or journeys. We referred to the Active Travel Act which states under Section 8 that 'the Welsh Ministers and each local authority must, in the exercise of their functions under Parts 3 and 5 of the Highways Act 1980, have regard to the desirability of enhancing the provision made for walkers and cyclists'.

Question Five – Do you think the monitoring and evaluation proposals set out in the draft Local Transport Plan are the right ones?

We do think monitoring is important and we are pleased to see it included. We do, however, think that in order for it to be effective it needs to have agreed targets and these targets need to be as ambitious as possible. In particular they should focus on achieving greater integration between modes and sustainability.

Question Six – Are there any other comments you would like to contribute about the draft Local Transport Plan?

We are in agreement with your comments that the LTP needs to do more to encourage a cycling culture, the Active Travel Act provides the perfect platform to deliver this message in the plan. We commented that the LTP should have a policy that recognises how the Active Travel Act will change the approach to designing and delivering highways schemes.