

National transport delivery plan (NTDP): 2022 to 2027

Your name: John Sayce

Organisation (if applicable): Wheelrights Swansea Bay's Cycling campaign

Email / telephone number: Wheelrights32@gmail.com

Your address: 46 Lon Cadog, SWANSEA SA2 0TN

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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:

The very ambitious targets for modal shift are to be welcomed.. The data from Stats Wales for the last 5 years to 2019 shows that

Private car usage and HGVs and Light vans has increased by approx. 10 pc.

Bus usage has declined by approx. 30 pc.

Cycling appears to be stable

Walking seems to show a long term decline.

The W.G. wants to completely change this picture in 5 years so that sustainable transport increases to 35 pc by 2025 (Net Zero Wales) and Cycling and walking) from 25pc to 33pc by 2027.(NTDP)

It would be helpful if the WG could co-ordinate target dates and then specify what are the separate targets for walking, cycling and public transport.

In setting their ambitious targets for walking cycling and public transport, the WG is therefore seeking a dramatic reduction in use of motor traffic. This is not adequately addressed in the NTDP

To have a coherent document, the WG needs to set out what are the target figures for all transport journeys in 2027 and what is the share that private cars, HGVs and Light vans will each have.

In Wales' successful household waste reduction programme the following elements were in place:

1. Clear and understandable targets on a yearly basis
2. Transparent monitoring and reporting of the behaviour
3. The responsible agency for delivery.
4. Incentives and or sanctions in place to ensure compliance.

Thus, one agency (the local authority) knew what they had to achieve and what would happen for failure or success.

All of these elements need to be in place and sadly this is not the case in this document. E.g If certain transport modes are the responsibility of the local authority, then elements 1,2 and 4 above must also be agreed. At the moment there is no proposal for monitoring or data collection of individual LAs, or any incentives/sanctions so progress is likely to be patchy at best.

Once the WG decides which agency is delivering on which outcomes, there needs to be an annual public statement on the progress achieved to ensure accountability. The National Transport Performance Board should be the reporting body, holding accountability for the Transport Strategy and Plan on behalf of the Assembly.

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:

Given the comments in Q1, this is very unlikely. The percentage of emissions from transport has remained virtually the same for 30 years despite several transport strategies and the Active Travel Act. The document lacks an analysis of how other countries and regions have achieved reductions in their emissions and what methods worked best. One example to mention is Slow streets San Francisco, a programme that used signage and barriers to limit car traffic and speeds on 30 corridors in an effort to make them more pedestrian and cycle friendly. The programme saw a 50pc reduction in vehicle traffic and a 17 pc increase in weekday pedestrian traffic and a 65 pc jump in weekday cycling traffic.

Given the huge financial and environmental cost of the switch to electric transport, resources should be directed towards the most efficient forms of transport, especially buses. Swansea for example has not a single electric bus on its bus or school transport routes. Transport poverty is a key issue for many across Wales and yet the document does not address this. Many of our greenest transport areas are those in areas of social housing as they have lower car ownership rates, yet they suffer from poor or non-existent alternatives like a frequent and reliable public transport service or safe cycle routes. Public investment in E charging points for private cars is yet another public subsidy for the richest few who can afford the cost of a new e-car.

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:

The priorities in the Llwybr Newydd focus heavily on the shift from private car use to sustainable transport as well as less need to travel. The document does not adequately address how to reduce car usage in any situation, even when there is little or no cost involved. e.g in traveling to school there is no mention of the need for annual travel surveys of staff and pupils and to set targets and rewards for individual schools and local authorities for behaviour change. The introduction of school home zones for all schools to encourage more walking is virtually cost free and sends an important message to both adults and children. (Swansea has not a single example of a school home zone).

The document needs to focus on research studies to show which policy elements produce the biggest change in travel modes. The proposed monitoring data does not include specific journeys like travel to school or work, thus making it hard to judge progress.

About 20 pc of the population of Wales are deemed to be living in rural areas and hence not able to access Active Travel funds. This makes the Plan's targets even harder to achieve as it means that the urban areas have to deliver almost all of the Active Travel modal shift targets.

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 comments and reasons for your response here:

The Well being ambitions in the WTS are set out as general statements with 11 different aims some of which are already covered in the answers above e.g Greenhouse gas emissions. These 11 different aims are not specifically referred to again in the WTS's section on 'how we will deliver' or in the NTDP.

It would be helpful if there were actions and targets set out clearly for each aim the WG wants to achieve. To give one example from Health. "Air pollution is the biggest environmental threat to public health. It is causing new lung conditions like lung

cancer and worsening existing ones.” Joseph Carter from Asthma+Lung UK stated when he welcomed the introduction of Low Emission Zones in most of Scotland’s cities. The NTDP needs to reflect a national approach to the control of polluting motor vehicles in our urban areas and incentivise Local Authorities to introduce LEZs in the next 2 years to safeguard our most vulnerable citizens.

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:

The priorities in the mini-plans are mostly written as vague statements that cannot be judged after the end of the 5 year plan. One exception to this is the introduction of the 20 mph speed restrictions, which should reduce accidents, and make roads more pleasant for cyclists and pedestrians to use. As it did with the 20mph zones, the WG should be trialling a number of initiatives in order to judge their effectiveness for a Wales wide roll-out.

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 plan needs to have clearly set out what modes are most important for changing behaviours in the 5 year period. Thus, increasing e- bus services is the easiest and cheapest way to get more sustainable transport usage. Several countries and regions have introduced free publicly operated bus services and increased service frequency (e.g. Luxembourg). This has been done at the same time as reducing road space for private cars and using this space for bus lanes and active travel. There seems to be an over-emphasis on rail transport which will only ever be able to serve a small percentage of the Welsh population for every day journeys like trips to the schools doctors or shops .

The issue of re-purposing road space from cars to other transport modes like bus use and cycling has not yet been addressed in a meaningful way that would lead to a reduction in motor traffic. e.g Swansea has even reduced the number of its bus lanes in the last 5 years!

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

Yes it does identify the most important sustainability issues although one might want to query some of the conclusions!

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

The plan has not commented at all on one of the fastest growing means of transport, scooters. Despite the fact that they are illegal, there are hundreds, if not thousands of these motorised scooters operating across Wales. They take the same road space and have a similar carbon footprint as electric bikes; therefore a valuable addition to the types of sustainable transport that the plan is seeking to encourage. Additionally, many can be folded up and carried on buses, so helping the integrated transport approach the WG is endeavouring to pursue.

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?

Private car travel has the worst social effects as it is often a solitary experience and does not allow people to use or practise their language skills. Buses in particular are likely to help improve language skills especially where drivers are Welsh speakers. The WG should commit to all bus drivers having some Welsh language skills so they can meet and greet 'trwy gymraeg'.

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.

As above.

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: