

## 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:

**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:

Given the Welsh Government's commitment to be net zero in greenhouse gases(GHG) in 30 years times, it is worrying that these 20year ambitions does not even mention this commitment and how transport will play its part. The last transport strategy failed to produce any reduction, indeed transport's share of GHGs actually increased in the last 12 years! Using words like significant, better and less is nowhere near concrete enough. If the Government can pledge a target of zero this transport strategy must be more specific about its role

**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:

There are several comments about new developments eg connectivity but none about addressing existing connectivity issues e.g free car parking in retail parks, which is effectively a subsidy that sustainable transport users pay to car users. New developments are well covered by the new planning guidelines, so the main issues remain the existing infrastructure.

**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:

Whilst these are 3 laudable aims, there needs to be a much bigger emphasis on GHGs emissions, air and noise pollution. So, our 3 priorities would be

1. Reduce GHG emissions from transport by 40 pc
2. Ensure that all private car journeys are reduced by 15pc though better public transport, more home working and reallocation of road space.
3. A reduction in air and noise pollution, which is killing at least 1,500 people prematurely in Wales every year according to the Centre for cities study 2020. A target to lessen these premature deaths should be included

**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 document seems to forget existing measures that are already in place to measure transport's role in society., By establishing new measures and baseline data it is pushing any targets way into the future when they need to set now. The priorities outlined in Q3 above shows how existing statistics should be used.

**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?

By emphasizing the need for a modal shift which encompasses both a reduction in private car use and an increase in train bus, cycle and walking numbers. Without targets and regular independent reporting on them, nothing will happen

**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?

Public transport needs to be identified as crucial to meeting any emissions targets. At least one County Borough needs to be identified where public transport is free for everyone and where there is a frequent service and a curtailment of car space to accommodate this. Whilst the GHG emissions statement is laudable in the connectivity section, any new developments will be minimal in terms of impact. The emphasis must be on the existing transport infrastructure which is centred on the private car. Road user charging should be mentioned here.

**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 plan for cycling and walking shows lack of intent and will not result any modal shift towards active travel. The plan needs to commit to

1. Ban on pavement and Shared use path parking.
2. Promotion of E-bikes and scooters.
3. Behaviour reinforcement programme to ensure that young people and young adults continue to use sustainable transport like buses and cycles, and not graduate to car

ownership or use.

4. E Car sharing clubs to be introduced, to reduce car ownership and free up more road space (for cycling and walking lanes) that is currently used for parking cars
5. Introduce a car parking levy for all employers funded by the taxpayers, so that money spent on the public services is not used to fund free car parking. This would also apply to all government departments and agencies, like the DVLA .

**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?

In terms of prevention and long term working, there is no consideration at all of the effect of the current transport usage on young people in terms of air and noise pollution or the effect of the private motor car dominating public spaces. This makes parents fearful to allow their children to walk or cycle to schools or the local parks. This in turn has produced much lower physical activity levels in all age groups in Welsh society. Children's rights need to be at the heart of this strategy, especially as children are the long term recipients of the current transport inequalities, seen for example instance in rising numbers diagnosed with asthma and other life limiting illnesses. Children from poorer socio-economic groups are more likely to be involved in death or serious injuries from road traffic. We also need to involve children in transport choices in their school councils and give them the right to recommend a school action plans around parking and active travel measures.

**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 would strongly support the introduction of Road User Charges ( RUC) as a way of reducing tax payers' subsidies for private motor vehicles. RUC monies should go towards sustainable travel provisions, especially E-Bike subsidy, better bus services and dedicated cycle and bus lanes to incentivize the travel behaviour we want to encourage. It also needs to be spent on measure to restrict private car space around schools to protect our youngsters.

### **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?

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

Yes the ISA is damning of this strategy saying that 'it appears unlikely that the measures in the WTS would reduce emissions at the rate required .....to comply with the wales carbon budget and the climate emergency'  
On protecting and improving air quality it says ' it is considered that overall, the WTS would make a minor rather than major (significant) contribution towards this ISA Objective'

**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?

**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.

**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?

**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?

The strategy needs to address some of the issues that women and those from the BAME background face. These two groups are significantly less likely to cycle which is an Active travel measure that the strategy seeks to encourage. One factor that comes up time and again is the perception of danger in sharing the road with motor traffic. This should be an issue that the Go-Safe partnership needs to be tasked with, as a reduction in deaths and serious injury of cyclists and walkers needs to be prioritized. This would have a beneficial effect on parents who would then be more likely to allow their children to walk or cycle in their locality.

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

Please enter here:

Your response form doesn't cover the delivery element of the strategy. There needs to be a much stronger element of monitoring of this strategy. Rather than the internal mechanisms proposed, there needs to be an independent body that is tasked with this. Otherwise this strategy will go the way of the way of the last transport strategy that did not produce the carbon reduction PROMISED and very little modal shift.

We are concerned that although the response paper asks about the 5 ways of working of the Well-being of Future Generations, it fails to ask if we think it meets the 7 goals of this act. Here the strategy comes up short failing to say how it is

aiming to tackle health inequalities or produce a more equal Wales.  
An analysis of the inequalities evident in current transport policy would then proceed to suggest solutions to ameliorate or improve the situation. For instance most poor communities in Wales have lower connectivity rates due to lower car ownership which is often the only transport choice in areas with poor bus services or no active travel routes.

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: