

## Consultation Response Form

Your name: Association for Consultancy and Engineering Wales

Organization (if applicable): Association for Consultancy and Engineering

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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:

The long-term vision is a welcome step forward. The following are suggestions to refine/strengthen it.

- The vision is largely introspective and stops at the Welsh border. Strengthening plans for improving strategic access to the rest of the UK and Europe would give business and future investors' confidence. In addition, the vision could put the Strategy in context with enabling and driving "Future Wales: the national plan 2040.
- The vision should recognize the very different demands of urban, inter-urban, rural travel and the movement of freight.
- Although the draft strategy does deal with integration, it is such an important aspect that the vision should include it. For example: "an accessible, sustainable and integrated transport system". A fundamental component of integrating sustainable travel is providing for the first and last mile for all users. The vision should perhaps address this.
- The vision would be strengthened by being more user-centric - enabling and facilitating people to make better, healthier and more sustainable transport choices.
- It would add context if the vision described the transformational nature of the strategy and the scale and urgency of change that is necessary to deliver decarbonization commitments.
- The vision understates the opportunities and co-benefits of the Strategy. Drawing this out would be a positive message, particularly for private sector.
- The vision ought to deal with embodied carbon in infrastructure as part of the sustainable approach to transport as well as focusing on emissions.

- The vision is silent on driving efficiencies from the way the Welsh Government, local authorities and rail authorities organize themselves. There are clear benefits from a model that combines and coordinates infrastructure maintenance.
- The National Infrastructure Commission for Wales' (NICW) Brief includes sectors within the vision and yet it's not mentioned in the Strategy. It would be helpful to explain the process of considering recommendations that come from NICW.

**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:

The ambitions are generally well founded, but the following observations could strengthen this section.

- The Plan makes only passing reference to maintaining the motorway and trunk roads within Wales. These include strategic routes that give access to the rest of the UK. As well as maintaining these, the Minister has a legal duty to review them and this implies undertaking improvements when necessary. The Strategy should acknowledge this, as working from home, active travel and public transport will not deliver all the answers. Roads are essential infrastructure; the issue is what fuels the vehicles.
- The sustainable travel hierarchy sits well with local/urban interventions, but there is no recognition of the more testing demands of rural and inter-urban travel and freight movements. The inter-urban routes cater for a high proportion of freight vehicles operating in a just-in-time economy. The vision deals with these issues and explain the transformation that will be necessary.
- E1 - should set out whether it includes rail, and if so set out the ambitions.
- E3 - making better use of infrastructure is already the first consideration in planning, but the Strategy should not preclude new build. In the right circumstances, new build can bring efficiencies and environmental benefits.
- E3 - implies that new infrastructure generates waste because old infrastructure becomes redundant. This is rarely the case in the highways sector as bypassed roads are rarely grubbed up. They provide for better local access and active travel. The statement "reducing the use of water and minerals is too vague.
- P1- it's encouraging to see recognition of the benefits of combining land use planning with economic ambitions and transport planning. ACE Wales fully supports this approach.

- P2 is a positive statement that would be greatly enhanced if expanded to include freight decarbonization and better links to ports. This could be developed into a sustainable freight plan for Wales.
- It would be good to see more specific and qualitative ambitions. The timescales and scale of ambition could be better aligned with Wales' commitments to net zero by 2050.
- Delivering the Strategy will require buy-in from an array of government bodies, the private sector and people. It would be good to see a statement about how this will be achieved and by whom.

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

- Strongly agree  Agree  Neither agree nor disagree
- Disagree  Strongly disagree  Don't know
- No opinion

Please provide your comments:

The five-year priorities are clear, but the following suggestions would strengthen them.

- Should the overriding priority be to develop a transport system that supports sustainable development to drive "Future Wales: the national plan 2040"?
- The road network is fundamental for travel by public transport, active travel and for effective access and connectivity. The priorities should include addressing safety and capacity issues on the strategic network and funding plans for local highway authority roads.
- Priority 1, P26 - 'We will manage demand by locating new employment, work, housing and other development close to where people live and...existing transport....' The plan should set out how the government will put this into practice within the regional and local planning system as it is.
- The aims regarding land-use planning are well set out, but again, the Strategy should explain how this will be implemented at local authority level.
- Strengthen Priority 1 as not only will it reduce greenhouse emissions, but in addition improve local air quality, enhance well-being, provide localization of services and create new economic opportunities as part of a sustainable green recovery investment strategy.
- Priority 2 assumes that the private sector will not innovate around this in a way that competes with the vision. Revised in the light of the private sector's response to Covid-19.
- The priorities are well stated for a future sustainable and active transport vision where employment and developments are located close to where people live. But there are many existing capacity problems on the existing road and rail networks due to misalignment of employment location, developments and where people live. The Strategy's priorities are unlikely to solve these with any of the new transport strategy priorities. At present

there are a huge number of people making journeys to work for which there are no reasonable alternatives. Economic agglomeration will play a stronger role in the location of business and employment than the location of people's homes. The strategy for transport should be clearer about what type of journeys are supported. The NDF chapter 4 is clear that for strategic and spatial choices, the focus is on development in cities and large towns and on co-locating homes with jobs. The strategy should be clearer on what will be the priorities for the development of the transport system to align with this. And, will areas that lie outside the priorities be 'maintained' rather than 'improved' or 'developed'? The Strategy should make this clear.

- Priority 3 should make it clear that this includes rail.
- There is scope to radically reform bus transport by contracting companies to deliver specified and exclusive services and roll up the cost of accommodating concessionary travel in the bidding process. This type of approach might be essential to address inter-urban and rural travel by public transport.

**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:

No, explained by the following points.

- Going from 5 to 3 priorities seems to lose the emphasis on innovation and digital. Improving digital connectivity is an important means of reducing travel for business. Neither freight nor inter-urban travel are adequately covered by the three priorities. The freight and logistics sector will need support to accelerate EV/hydrogen application.
- Priority 2 should deal with providing for the first and last mile travel modes to fully integrate journeys.
- The priorities section should focus on encouraging people to think differently about how they move around Wales. Whilst the content of this section is good and clear, it should be re-ordered. This section starts off by describing all the punitive action WG will take against car users, like disincentives for car use, and ends with the improvements that will be made to public transport. The carrots should come before the sticks. Selling an alternative to the public must surely take account of the fact that in spite of all the geographical, time, weather and physical challenges, travel by

modes other than the private car is best. For inter-urban travel, the priorities are unhelpful.

- The table on page 48 identifies the transport leads and deliverers, but to complete the picture it should be clear on the delegated powers and funding arrangements.
- The strategy should acknowledge that growth in electric vehicle is a very real outcome, so the strategy should be clear how this data will be captured and have the flexibility to adapt.
- Reducing travel (i.e. more working from home) might be a good alternative for the commuter, but the Strategy should be realistic about the continuing demand for transporting supplies and materials and providing storage while in transit to reduce warehouse capacity.

**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?

Not completely, explained below.

- Reliability, predictability and consistency are vital for inter-urban and freight transportation. So, journey time and journey time reliability are crucial measures for customer satisfaction and these should be captured for the various modes of transport.
- Capturing traffic volumes and trends will help shape future interventions. There would be benefit in starting this now to pick the impact of post Covid-19 recovery.
- Make use of KPIs used successfully elsewhere and make best use of digital systems to collect.
- The climate challenge requires transformation objectives and cross sectoral systems wide planning rather than adaptation by sector. So, the Strategy should explain how planning will be cohesive and coherent across the energy and transport sectors within current regulations and delegations.
- To make the Strategy more inclusive, include for private vehicle transportation for those with disabilities and living in remote areas.
- The Strategy could include governance and institutional arrangements for transport decarbonization - a plan and framework for delivery that facilitates comparison of benefits and dis-benefits of interventions for decision-makers.
- The Strategy would benefit from including the economic principles and mechanisms to promote transition and clarity about the cost differential between public transport and driving.
- Using fuel duty and emission and congestion-based road pricing would have impact but including in the Strategy hypothecation of the charges for

promoting public transport and active travel would give a positive message, making the “pain” more bearable.

- The Strategy should provide clarity about how interventions will get into local development plans, who will capture the data for audit and the source of funding.

**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?

- Yes, but these should be realistic and take account of urban, inter-urban and rural travel demands and difficulties.

**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?

Yes generally, with the following suggestions.

- Use Freight Facilities Grants to encourage parcel trains.
- Provide better access to and from Ports
- Collaborate with Network Rail and KeolisAmey for rail in the Decarbonization Pathway.
- Bring Universities in to support research and 5.5 could include support for building the right skills capacity and research facilities.
- Make accountability and responsibility for delivery across the public sector much clearer, the fit with regional transport planning and alignment with the three main NDF regions.
- Give local authorities clear targets and the powers and governance to act.

**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?

Yes, generally with the following observations/suggestions.

Rail (7.3):

- Include seating and the provision of wi-fi in the targets. Explain the term 'renewable diesel locomotion'. Clarify what is meant by decarbonization and the extent of electrification.

Freight (7.7):

- Include influencing consumer behavior regarding packaging and provide better information about where goods come from and the carbon implications. Port to rail connections are important and the need for road freight is inevitable.

Taxis and PVH:

- Digital could play a part in improving user confidence.

**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?

This section is a statement of intent not drafted to consult. Therefore, it could be removed and be available as supporting information. This would simplify the consultation document and reduce repetition.

Alternatively, consult on the five ways of working proposals.

**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?

- Fairness to everyone is not easily achieved. Perhaps the emphasis should be on transparency and hypothecation to fund public transport and active travel measures.

### 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?

- Carbon sequestering? Could we do this on a large scale or encourage people to do this at a local level - gardens, green space and other public areas? Utilize public buildings and the transport estate.

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

**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?

- Yes, particularly in rural communities and areas of deprivation. Carrots before sticks.

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

Please enter here:

There are spelling and grammatical errors that should be corrected.

There are many pictures that have little or no relevance and make the document longer, less manageable on a computer screen and costly to print. Many are in an urban in setting served by public transport or in rural places only accessible by car. Perhaps they should be more representative of the realities of transport.

The questions are quite closed, and this makes it difficult to tick the boxes with real meaning. Perhaps open questions would be more suitable for future consultation.

What isn't clear is how the government will deliver and fund a strategy that cuts across various authorities' and private companies' responsibilities and accountability.

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: