



Llywodraeth Cymru
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Consultation – summary of response

Draft National Transport Delivery Plan: 2022 to 2027

27 January 2023

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg
We welcome correspondence and telephone calls in Welsh

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1 Introduction

The draft National Transport Delivery Plan 2022 to 2027 (the plan) is the first 5 year delivery plan for the Welsh Government to implement [Llwybr Newydd: The Wales Transport Strategy 2021](#). The strategy sets out three priorities:

- Priority 1: Bring services to people in order to reduce the need to travel.
- Priority 2: Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.
- Priority 3: Encourage people to make the change to more sustainable transport.

A 12-week consultation exercise for the plan took place between 19 July 2022 and 11 October 2022. This report summarises the responses to the consultation exercise and outlines the next steps.

2 What was the consultation about?

In order to develop the final National Transport Delivery Plan 2022 to 2027, a range of stakeholders' views and perspectives on the draft plan were sought through an online survey and written correspondence.

3 The responses

In total, **97 consultation responses were received**. The respondents were split between the various organisational categories, **with 52% from the 'Private individual' and 'Other' categories**. Some of the responses were partially completed with respondents choosing not to provide a response or comment on all questions. The respondents are listed in Annexe 1. There were a range of respondents from a broad variety of organisations and geographical areas.

All the responses have been considered fully and will inform the finalisation and implementation of the National Transport Delivery Plan 2022 to 2027.

4 Overview of the responses to each question

4.1 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?

Response	Number
Very positive	6
Positive	34
Neutral	21
Negative	14
Very negative	10
No opinion	12

41% (40) of respondents thought the plan would have a positive or very positive impact on the Welsh Government's targets for creating modal shifts to more sustainable forms of transport, and 25% (24) responded that it would have a negative or very negative impact. Suggestions included greater consideration of community barriers, including connectivity, social needs, affordability and digital access and literacy to enable modal shifts.

It was also requested that the plan should more clearly address rural inequality and provide more clarity to local authorities, as well as provide greater clarity on the funding of infrastructure upgrade and maintenance, roles and responsibilities of the Corporate Joint Committees (CJCs), shifting freight from road to rail and integrating coaches into the plan. Greater collaboration was considered imperative to the targets and long-term success of Llwybr Newydd.

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

Response	Number
Very positive	6
Positive	36
Neutral	22
Negative	13
Very negative	7
No opinion	13

43% (42) of respondents thought the plan would have a positive or very positive impact on the targets, praising its alignment with Llwybr Newydd and the comprehensive approach to modal shift.

21% (20) of respondents thought it would have a negative or very negative impact,

commenting that rural areas needed significant investment to reduce reliance on private cars and that the targets relied on systemic change.

There were some concerns that speed limit reductions could lead to increased congestion and air pollution and although some were in favour of road-user charging to raise revenue, others raised concerns about the impact on less connected communities. There was also a suggestion that infrastructure and services need to be in place before charging schemes are implemented.

Other suggestions included greater electrification of the railway; an improved network of Electric Vehicle (EV) charging points for cars and e-bikes, with powered wheelchairs also having access to these; and more emphasis on reducing road freight and air travel while balancing the needs of the business economy.

In order for the plan to be met, some respondents suggested setting clear deliverables and targets, including a reduction in car miles.

4.3 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?

Response	Number
Fully	5
Partially	25
In a limited way	31
Not at all	16
Unsure	7
No opinion	13

5% (5) of respondents fully thought the plan would meet the priorities, 26% (25) believed the priorities would be partially met and 32% (31) in a limited way, raising concerns about funding and suggesting the need for a collaborative approach to long-term investment and revenue.

Other suggestions included producing clearly defined deliverables, monitoring and research to understand outcomes and maximise impacts; improving internal processes for project delivery to streamline costs; closer working with local authorities; and expediting TAN18 review.

A few respondents were also concerned about affordability and inclusivity and that funding may be focused in and around urban areas, furthering the disadvantage of rural communities.

4.4 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?

Response	Number
Fully	5
Partially	28
In a limited way	20
Not at all	23
Unsure	9
No opinion	12

5% (5) of respondents fully thought the plan would meet the ambitions while 29% (28) thought it would be partially met and 21% (20) that it would be met in a limited way. Concerns were raised about the financial burden and the impact on rural areas, including reduced access to education, employment and leisure. There was also concern that the plan could deepen the socio-economic divide within communities.

Suggestions included: improve safety and accessibility on public transport; ensure a cohesive approach across Wales; expand discounted travel schemes to part-time workers; and ensure greater collaboration between sectors, services and communities.

It was also suggested that wellbeing actions and targets be placed against each deliverable.

4.5 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?

Response	Number
Strongly agree	5
Agree	21
Neutral	29
Disagree	17
Strongly disagree	10
No opinion	15

Respondents were divided about the plan's ability to meet the five-year priorities, with 27% (26) agreeing or strongly agreeing and 28% (27) disagreeing or strongly disagreeing.

Some respondents commented on the lack of delivery commitments and corresponding budget and were concerned that the priorities would take longer to achieve.

A range of suggestions were made, including more focus on Active Travel behaviour change; equality and accessibility to be ensured across all modes; greater collaboration between transport sectors to ensure a joined-up approach; and the need for a long-term funding strategy.

A few respondents also requested that the safety interventions in the rail mini-plan do not impact on routes used by cyclists and walkers. Other suggestions included heritage rail opportunities are recognised; licensing for and accessibility of taxis and private hire vehicles is improved; initiatives are trialled and monitored before rolling out; and an e-cycle purchase loan scheme and cycle hire is developed across Wales.

While a few wanted less emphasis on highways, some respondents requested that the economic benefit of highways be recognised, and maintenance and renewal be included in the plan.

There were also a few concerns about a sector-wide lack of expertise in Active Travel and the capacity to deliver it. Respondents felt there is the need to address this to ensure the priorities are met.

4.6 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?

Of the 72 respondents that included a Yes or No to this question, 26% (19) agreed and 32% (23) disagreed that the plan finds the right balance.

Although there was much support for Active Travel, 18% (13) of respondents raised concerns that development and maintenance of the local road network was not included in the plan, some of which went on to express the importance of roads for cyclists, buses, emergency vehicles and businesses. A few also requested that new developments continue to include road access.

Some respondents were concerned about the financial burden on the people of Wales, while others highlighted the travel needs of some sections of society, such as older or less mobile people and those with a disability and that these should be fully considered to avoid restricting access to services.

Other suggestions included ensuring buses and coaches play a key role, providing more clarity on how to achieve behaviour change and on the investment split between modes of transport, as well as, strengthening collaboration between sectors and operators within the plan and reviewing it regularly to ensure the approach does not become fragmented.

Although the plan's ambition was praised, two respondents were concerned that it may not be achievable in the current economy and that public expectation should therefore be managed.

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

Of the 65 respondents that included a Yes or No to this question, there was an equal balance with 29% (19) thinking the most important issues were identified and 29% (19) thinking they were not.

A few respondents were concerned that the plan would fail to significantly reduce greenhouse gases and requested that the plan be revisited to address this. Another suggested it might be useful to explain if the greenhouse gases assessment is related to impacts from particular activities, such as aviation, or wider concerns about the plan's effectiveness.

There was also a request to reference the Climate Change Adaptation Plan, in particular, the key risks and opportunities facing Wales with regard to business.

Other requests included cheap, sustainable, reliable public transport; collaboration with suppliers during procurement process to ensure sustainable approach and value for money; the prioritisation of green infrastructure; and destination management plans to support connectivity to national parks.

Respondents also highlighted equality, including requests for interventions targeted at women and people from ethnic minority backgrounds; to clearly identify the needs of disabled people (including the vision impaired); to recognise the important role information and technology can play; and to strengthen the role of community transport in meeting equality, inclusion and accessibility goals.

There was a further comment that each local scheme would have location-specific issues that would need resolving and mitigating.

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

Active Travel was welcomed by many respondents, who stated that a firm commitment was required in order for the Active Travel measures to work, through a programme of behaviour change and by including as many rural communities as possible.

To be attractive to passengers, respondents suggest trains need to be comfortable, contain toilets and reliable wi-fi and have a streamlined cycle booking system. There should also be greater rail connections, including a north-south link, but there was concern about the short-term reliance on diesel trains. A shortage of train and bus drivers was highlighted, and a few requests were made for support to improve recruitment and training for this sector.

It was noted that the home-working policy could impact further on public transport and suggested that businesses be encouraged to incentivise employers to use public transport. There was also a concern that the reduced speed limit would discourage people from using buses.

It was recommended that accessibility needs to be more prominent to ensure individuals are not disadvantaged. Consideration for the impact of electric vehicles on the blind and partially sighted was requested, as was training support to help disabled people use public transport better. To be more inclusive, include wheeling with walking and cycling when discussing Active Travel.

Within the plan, it was suggested there should be more clarity on the governance roles, responsibilities, expectations and processes, with measures to reinforce accountability and transparency.

There were also requests for the plan to take greater account of other policies around climate change; to recognise the benefits of and include a greater role for the third sector; to include the leisure and tourism sector; and for projects funded by others to be separated. It was also requested that monitoring data be made public.

4.9 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?

Respondents welcomed Welsh language standards for buses and requested that these be extended to trains. It was suggested that customer-facing staff have Welsh language skills; and ensure all signage, ticketing and public documents be bilingual. It was also requested that this approach be extended to shipping, airlines and the third sector.

While many welcomed bilingual signage and documents, there was concern about the cost and the environmental impact of printed documents.

There was a concern about rural communities where there is a higher density of Welsh speakers and that the policies to provide transport to these were aspirational and costly. It was also commented that a better transport network, including roads, connects communities linguistically and culturally as well as providing greater education and economic opportunities.

4.10 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.

For rural, Welsh-speaking communities to remain strong and vibrant, it was requested that support for economic development and new roads be included in the plan.

Other suggestions included bilingual signage; re-opening local stations to connect Welsh-speaking communities; place names to be recorded and referred to in Welsh; Welsh language standards introduced for the rail industry; and more Welsh speakers employed in the transport sector.

4.11 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:

It was recommended that training in Active Travel should be extended to local authorities. However, local authorities were concerned about the impact of the implementation and monitoring of the plan on budget and staff resources.

Transport suggestions included e-scooter trials, fast charging EV points, commitments to increase frequency of public transport to be maintained, funding for routes allowing for positive consideration of leisure routes, better airport connection and greater accommodation of cyclists on public transport.

Roads were also referred to with calls to move haulage from road to rail and to ensure roads are not neglected in the plan.

Sustainable transport should be given more priority in the planning process and Active Travel infrastructure prioritised. There was concern though that the alignment of land development proposals with transport priorities may be unachievable.

Requests were made for further clarity in the plan, including ascertaining if projects are aspirational or deliverable; the role of UK Government in the integration of transport and the challenges this could pose; charging for parking and road use; funding and support for local authorities; and to include ambitions for west Wales in the plan.

It was also requested that transport poverty, air quality and health inequalities were more fully addressed.

Digital connection and literacy and options to pay by cash was a concern, as was rural connectivity where schools, hospitals and shops are not always in close proximity.

5 Responses and Delivering Llwybr Newydd: The Wales Transport Strategy 2021

- **Priority 1: Bring services to people in order to reduce the need to travel**

Respondents welcomed the plan's priority to bring services to people so that there is less need to travel, but concerns about the plan's ability to achieve this included the following: community services, such as hospitals, are often centrally located; commercially driven services, including shops, tend to be sited in areas of higher population; and some ambitions, such as co-working hubs, rely on private investors and may therefore be harder for Welsh Government to implement. There would also be a greater impact on rural communities where there is a lack of services and the need to travel to access them greater.

One respondent commented that many services are available locally, but are only accessible by car, and went on to request that there be more hyper-local transport schemes to address this.

The role of planning will play a key role in determining new development sites, location of new services and ensuring new buildings have easy access to walking and cycling routes and public transport. It was therefore requested that more clarity is provided on planning policy.

“It will be important to ensure that future development sites are selected on their ability to promote transit-oriented development. By ensuring that development sites are located within sustainable locations, with good access to sustainable transport options and local services, a greater alignment with the 20-minute Neighbourhood principles can be achieved.”

An Organisation, Respondent 60, Q2

- **Priority 2: Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.**

Respondents agreed that the plan aligned with the priority to allow people and goods to move easily.

“Of the three headline priorities from Llwybr Newydd, the NTDP will particularly contribute to the second of these, allowing people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.”

An Organisation, Respondent 83, Q3

Connectivity across the whole country is vital, particularly in rural areas that are less likely to have existing infrastructure; and to ensure the plan's success, respondents requested regional consideration, a joined-up approach to investment and strategic initiatives and widening the network of EV charging points.

Digital connectivity was also important, including wider digital access and digital

literacy.

Policy reform and legislation may be required to fully integrate buses with other modes of public transport and public transport needs to be reliable, convenient and fully accessible to be attractive to users.

The quality of local road networks were a concern for some respondents, with requests to include a programme of maintenance and development to ensure routes are safe and suitable for business use, as well as cyclists.

For a few respondents there was concern about the use of diesel trains and the need for transport to be sustainable.

- **Priority 3: Encourage people to make the change to more sustainable transport.**

Respondents agreed with helping people make shifts in the way they travel, but there needs to be a recognition of the reasons for the choices people make and how these can be addressed.

“What may be difficult in rural areas is encouraging significant behavioural change to more sustainable transport modes given the geography, rural nature and existing infrastructure already in place.”

An Organisation, Respondent 77, Q8

Supporting businesses to incentivise employees to use other modes, the use of mobility hubs and ensuring an integrated approach to the whole journey were all welcomed. However, there were calls for these to happen sooner to encourage travel shifts.

There were also requests for a clear programme that is aimed at changing behaviours and motivating a shift away from private car use, which can be rolled out.

6 Summary

More than a third of respondents 41% (40) agreed that the plan would positively impact on Welsh Government’s targets for creating modal shift to more sustainable forms of transport and 43% (40) with its ability to reduce emissions. There was further recognition that this transport delivery plan covers a five-year period and that other plans will evolve to meet the long-term ambitions of Llwybr Newydd.

Respondents note there are challenges to achieving Active Travel in rural communities and concerns that a lack of infrastructure and connectivity may cause urban/rural socio-economic inequality, as well as impact on the Welsh language, given the higher density of Welsh speakers in more rural areas. There was further concern about widespread affordability and the cost of infrastructure placing a long-term financial burden on the people of Wales.

Suggested areas for improvement included a stronger focus on Active Travel and a clearer programme that took into consideration accessibility, the challenges of outlying and rural communities and that incentivised behaviour change.

“The plan contains little that will deliver incentives to shift mode, and almost nothing to disincentivise use of motor vehicles.”

An Organisation, Response 67, Q1

Although Active Travel was widely supported, some respondents were concerned that the omission of a plan for the improvement and maintenance of the road network would negatively impact the economy, services, and rural communities.

“Well-maintained highways remain vitally important for business/the economy, and they are also needed by buses, cyclists and emergency vehicles.”

An Organisation, Response 60, Q6

Respondents queried the reduced speed limit and the impact this would have on bus travel, congestion and emissions. There was also concern about the road-charging scheme and its potential for promoting socio-economic inequality.

Being one of the key elements of modal shift, it was recommended that public transport needs to be affordable, accessible, safe and comfortable in order to be promoted as an attractive alternative. There also needs to be consideration of linked journeys and the facilities required to enable this.

Respondents praised the plan’s ambitions but commented that greater detail would benefit the plan’s success. Requests included clearer delivery commitments, timescales and budgets, clarifying the roles of local authorities and other bodies, including CJsCs, and consideration of other reviews and strategies such as WelTAG and Wales Road Review, as well as the inclusion of greater collaborative working between sectors.

“The plan does not make clear roles and responsibilities in terms of executing the plan or allocation of funding. Timeframes are lacking which will render it difficult to monitor progress and take remedial action if projects start to lag.”

An Organisation, Response 86, Q8

Additionally, a lack of skills and capacity could hinder progress and ways to address this needed further consideration.

It was recommended that these details be considered when finalising the National Transport Delivery Plan 2022 - 2027.

7 References

Llwybr Newydd: Wales Transport Strategy 2021 [online] Available: [here](#)

Welsh Government (2015). *Well-being of Future Generations (Wales) Act 2015*. [online] Available: [here](#)

Welsh Transport Appraisal Guidance (WeITAG) [online] Available: [here](#)

8 Annexes

Annexe 1: Organisations who have responded to the consultation:

- The Association of Convenience Stores (ACS)
- Associated Society of Locomotive Engineers and Firemen (ASLEF)
- Association for Consultancy & Engineering
- Bridgend County Borough Council
- The British Standards Institution (BSI)
- Bus Users Cymru
- Caerleon Civic Society
- Cardiff Civil Society
- Carmarthenshire Cycling Forum
- Confederation of British Industry (CBI)
- CECA Wales
- Ceredigion Council
- Chwarae Teg
- Chartered Institution of Highways and Transportation (CIHT)
- Chartered Institute of Logistics and Transport in the UK (CILT)
- Community Rail Network
- Cross Party Group – Active Travel Act (CPGATA)
- CPT Cymru
- Confederation of Passenger Transport (CTA)
- Cycling UK
- Enterprise Holdings
- Great Western Railway
- Gwynedd Council
- Heritage Railway Association
- Institute of Civil Engineers (ICE)
- Isle of Anglesey Council
- Learning Disability
- Leonard Cheshire
- Midlands Connect
- National Trust
- Newport Council
- North Wales Wildlife Trust
- Pembrokeshire Council
- Public Health Wales
- Railfuture Wales
- Road Haulage Association (RHA)
- Rhondda Cynon Taf Council
- Royal National Institute of Blind People (RNIB)
- Royal Town Planning Institute (RTPI)
- Snowdonia Society
- Sustrans
- Tarmac
- Trafnidiaeth Canolbarth Cymru / Mid Wales Transportation (TRaCC)
- Transport Focus
- Wheelwrights
- Welsh Local Government Association (WLGA)
- Zenith Logistic Consultants Ltd