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11 March 2015

Dear Sir/Madam

**Wales National Transport Plan 2015: Strategic Environmental Assessment  
Environmental Report (December 2014)**

The purpose of the Natural Resources Body for Wales (Natural Resources Wales) is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment and economy of Wales now and in the future. Our comments are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and as advisers to Welsh Government on the natural heritage and resources of Wales and its coastal waters.

We welcome the work that has been undertaken to date in preparing an Environmental Report to identify, describe and evaluate the likely significant effects on the environment of implementing the Wales National Transport Plan. We advise that the plan could be further strengthened with greater consideration in the Strategic Environmental Assessment to -

- the resilience needed to address climate change and its variability;
- alternatives such as public transport, rail infrastructure and marine transport (ferries);
- strengthening the link between infrastructure investment and economic growth;
- the integration of transport modes (road/rail/ferry/port); and
- the agricultural, energy and forestry sectors important to the rural economy of Wales.



We expand on these points in Annex 1 attached here. Our comments should be read in the context of our response to the scoping stage of this assessment process (2nd October 2014).

Finally, we are mindful of the requirement on you to prepare a summary of the how the responses to the consultation on the Environment Report have been taken into account in the final decision to approve or adopt the plan. Therefore should you have any queries, or would like to arrange a meeting to discuss our response further, please contact Keith Davies, Planning, Landscape, Energy and Climate Change Manager at [keith.davies@cyfoethnaturiolcymru.gov.uk](mailto:keith.davies@cyfoethnaturiolcymru.gov.uk)

Yours faithfully

A handwritten signature in black ink, appearing to read "Rhian Jardine". Below the signature is a thin horizontal line.

Rhian Jardine  
Pennaeth Cymunedau Cynaladwy / Head of Sustainable Communities

## **Annex 1: Wales National Transport Plan 2015: Strategic Environmental Assessment Environmental Report (December 2014)**

1. Other transport types – The SEA Environmental Report has a strong emphasis towards road transport in Wales. Detailed consideration of public transport, rail infrastructure, marine transport (ferries), and consideration of the integration of transport modes (road/rail/ferry/port) would strengthen the plan.
2. Evidence gaps – Given the importance of agricultural and forestry freight within Wales, consideration should be given to filling this clear evidence gap to inform the next round of strategic transport plans in Wales.
3. Alternatives – We agree with the conclusion that a ‘no plan’ alternative does not enable an effective way of achieving the Wales Transport Strategy priority outcomes, however we would have liked to have seen alternatives and options considered within this assessment process on a sequential basis as indicated in Appendix 6 of the ‘Practical Guide to the Strategic Environmental Assessment Directive’. This guide suggests that ‘it is normal practice when developing a plan or programme to propose different ways of fulfilling its objectives’ i.e. need/demand, mode or process, location and timing and detailed implementation. It is accepted that not all of the ‘hierarchy of alternatives’ are applicable in the Wales Transport Strategy but suggest that a strategic transport plan could still consider whether its objectives could be met by technologies or methods with less environmental impact. The lack of internal or sequential alternatives for plan objectives makes it difficult to consider whether it might be possible for less damaging objectives or interventions to be undertaken.
4. Positive cumulative effects – The potential for potentially ‘significantly positive’ cumulative effects for greenhouse gas emissions has been identified in the Environmental Report but we note that this statement is qualified by the suggestion that significant positive effects ‘will be dependent on modal shift to more sustainable transport modes’. The Plan could be further strengthened by exploring the potential to deliver various ‘options or alternatives’ in terms of transport modes, not only in areas with dense and urban populations with ‘mature’ and potentially integrated transport infrastructure but also in rural and sparsely populated areas where few transport mode alternatives are available other than the private car.
5. Air pollution – We welcome the aspiration to reduce the contribution of transport to ‘local’ air pollution but suggest that this aspiration be broadened to include reducing the contribution of all transport modes in Wales to the diffuse pollution affecting, in particular, our upland natural heritage. It is with concern that (in 2009) the 30 European Site features in the UK most affected by acidification resulting from road

transport included the Berwyn and South Clwyd Mountains SAC, Snowdonia SAC, Usk Bat Sites SAC and Brecon Beacons SAC and that Wales suffers disproportionately from the effects of imported emissions from out with the UK. NOx derived from road traffic is the reason why 35 of Wales's 36 Air Quality Management Areas have been declared. We welcome the remedial measures suggested but note that: "The success of the Plan in achieving this will however be dependent on the behavioural change that is required to result in a shift to these more sustainable modes of travel". This aspiration needs to be linked to a commitment towards improving air quality in Wales and in addressing issues relating to traffic derived pollutants and their effects on human and environmental health within the Plan and we would suggest that this assessment process should recommend Welsh Government draw up an Action Plan to address the issues of failing air quality, and keep under review the effectiveness of its planned interventions – paying particular attention to behaviour change.

6. Climate change – The adaptation element has been scoped out effectively and we note the overall conclusion (page 36) that: "The transport system may be more vulnerable to flooding and extreme temperatures as the effects of climate change are felt. Hence, transport infrastructure should be designed and maintained to be 'climate change resilient'". The report is correct to highlight the climatic trends in the UKCP09 projections, with recent work by the Met Office emphasising that "*New analysis suggests that we should also plan to be resilient to wet summers and to cold winters throughout this century*". Transport infrastructure needs, therefore, to be resilient to year-on-year climate variability as well as to underlying trends in climate change. The resilience of transport infrastructure to climate change and variability needs to be viewed alongside the existing backlog in maintenance and the Plan could be further strengthened in this area.
7. Light pollution – The likely increase in light pollution and decrease in 'tranquillity' with further development of transport infrastructure have been identified however, we would expect to see the Plan and its SEA process to identify opportunities to reverse these trends and to remediate the adverse effects associated with light pollution and loss of tranquillity.
8. Mitigation – We acknowledge the proposals to mitigate adverse effects at project level however, deferring the consideration of effects and the development of mitigation measures at the lowest project level may compromise the consideration of cumulative and synergistic effects and inhibit the strategic nature of SEA and its ability to consider avoidance and mitigation measures at the regional and national spatial scale.

9. SEA Objectives – We welcome and support the strengthening of objectives 1.7, 2.9, 3.2, 8.1 and 5.5 further to our comments on the scoping stage of this assessment process. However, NPT objective 4 (Biodiversity) we would recommend that the ‘summary of issues from the baseline review’ should include specific reference to eutrophication (nutrient enrichment) of soils and vegetation/habitats resulting from traffic emissions as an ‘issue’ to be considered. Nutrient enrichment is recognised as a potential issue of concern and the impacts of nitrogen on the ‘conservation status’ of Natura 2000 sites is now recognised under Article 17 of the Habitats Directive.
10. Greenhouse Gas Emissions – Significant adverse effects have been identified for this Plan objective. The identification of a single ‘intervention level’ where slight to severe effects in terms of greenhouse gas emissions, have been predicted could be identified and further alternatives and mitigation measures considered.
11. Consideration of alternatives or mitigation – Significantly adverse effects have been identified for the Plan objectives in a number of areas including soils, cultural heritage, landscape and Greenhouse Gas Emissions for one or more intervention. We would suggest that this intervention should be identified given that without recourse to the appendices attached to this Environmental Report, this is unclear and it is unknown at this point whether this ‘intervention’ has already been proposed, assessed and approved and/or whether any alternatives or mitigation measures could be considered.
12. Appendix C: Assessment Tables – We have a number of detailed points to make on the assessment tables which we would be grateful to discuss with you.