Consultation Response Form

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Organisation (if applicable): Natural Resources Wales

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Your address:

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:

Whilst we generally support the objective within the Vision for an 'accessible, sustainable transport system', it is unclear from this wording and the explanatory narrative in page 12 of the consultation document how it is reflective of resilience considerations such as the resilience of the transport infrastructure in light of climate change and its consequences. We recommend reference is made to these considerations here including flood risk from all sources, heat (buckling of rail tracks/melting tarmac) and erosion (from increased intensity of storm events).

For the objective in the Vision for 'More people can use sustainable transport options to access and enjoy arts, sports, and natural and cultural heritage in Wales.' we recommend an additional way to achieve this aspect of the Vision is to:
'Collaborate with National Parks and Areas of Outstanding Natural Beauty, which are our most visited areas of natural heritage in Wales, to develop and deliver sustainable transport plans in order to improve travel options.'

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:

We generally support the long-term ambitions including the objective:

- for a transport system that contributes to a more equal and a healthier Wales. We recommend that an action to help achieve this should include reviewing the effectiveness of the Active Travel (Wales) 2014 Act to deliver new active travel infrastructure since its enactment, and commit consider legislative amendments if appropriate.

- for a transport system that responds to the climate emergency, contributing to a globally responsible Wales and a more resilient Wales. However, we have concerns that the actions identified to support this ambition does not include a review of existing transport infrastructure to understand their long-term resilience to the risks of climate change including flood risk and consequence, and coastal erosion. We advise that this is an important objective to ensure the transport system remains operational now and in the future. For example, we already see the impacts of flooding and coastal erosion on road/rail infrastructure and how long it can take to get these fully operational again after flooding or erosion. It is anticipated flooding is likely to become more frequent and more severe and with increased risks arising from rising sea levels– long term planning is needed to improve resilience, which may mean relocation of infrastructure rather than just improved defences as this may not be sustainable longer term.

Furthermore, we have concerns that the objective does not recognise the contribution of increasing, improving the extent, connectivity, and condition of active travel infrastructure, towards this ambition, or the contribution of increasing of electric vehicle charging infrastructure.

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:

We are generally supportive of the priorities, and in particular the commitment to plan for electric vehicle charging infrastructure, and to develop a transport strategy aligned to Future Wales 2040 to reduce the need to travel. However, we recommend that a plan to increase and improve the provision of active travel routes should also be a priority coupled with a programme to support behavior change away from unsustainable travel modes.

We also consider that it is important to start detailed joined-up planning for infrastructure which is at risk due to climate change to enable the other goals within the vision to be achieved. This will require cross-departmental working e.g. with Flood & Coastal Erosion Risk Management, and with the UK Government for non-devolved matters such as railway infrastructure. We recommend reference to this is made in the 5-year priorities.

Priority 1, *planning for better connectivity*. This refers to locating new employment, services & leisure close to where people live and to existing transport routes. We

recommend that links with Future Wales 2040: National Development Framework (NDF) narrative on connectivity are referenced here to ensure clear alignment of the WTS and the NDF.

Priority 2 (page 30) '*ensure that bus and rail services can adapt effectively to unexpected emergencies (e.g. pandemics, flooding) and major planned events.*' Emergencies such as flooding are not 'unexpected', particularly when assets are located in known flood risk areas. We advise that the text is amended to state that mitigation and contingency measures/plans should be prepared and ready to be put in place in the knowledge that emergencies such as flooding *will* happen. This will help ensure minimal impact to the transport system and maintain connectivity and operational capacity.

Priority 3 (page 32) Although NRW don't maintain transport infrastructure, the maintenance and management of the flood defence infrastructure across Wales is essential to reduce the risk/impact on the transport infrastructure/links throughout Wales. We recommend that reference is included to this role in this priority.

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:

We support the above priorities.

Q4: We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

Yes [x]   No [ ]

Can you suggest others?

We recommend a measure is included that monitors the percentage of journeys impacted due to weather related incidents – e.g. rail services suspended due to flooding, landslides, lines buckling (heat), leaves on track.

We also recommend a measure is included about length (or percentage) of transport infrastructure at the coast which is being managed in line with SMP policies, and length (or percentage) of transport infrastructure at the coast likely to be affected by coastal adaptation (as indicated in SMPs) for which planning has started.

We recommend that measures should also be identified to monitor progress on the delivery of new dedicated cycle routes, and the extent of continuous cycles lanes (un-fragmented).

M3 – We recommend that this measure could usefully be split into active travel that is done for recreational purposes and that which is done for commuting purposes. We consider that many councils in Wales are doing well when putting in place recreational routes, but not so well when it comes to putting the infrastructure in place to support more sustainable ways of commuting.

M7 – We recommend an alternative measure is included here to 'what percentage of the existing soft estate is actively managed for wildlife/ biodiversity benefits/ ecosystem resilience?'. We do not consider a 'healthy ecosystem' could be easily measured.

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?

None.

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?

We have no further comments.

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?

Please see our above comments on actions and measures we believe should be reflected in the Strategy to improve the provision of active travel infrastructure, and the resilience of infrastructure in response to climate change risks.

Other Comment:

Mini plan for roads, streets and parking (7.4) – We would welcome stronger reference here

to green infrastructure, particularly opportunities to strengthen the green infrastructure network when maintaining and improving the road, street and parking network.

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   [x]   No   [ ]

Do you have any comments?

The main tool to ensure the consideration of the ways of working through the implementation of the WTS, respective mini-plans and local / regional transport plans is through the application of WelTAG (Welsh Transport Appraisal Guidance). The WTS already mentions that WelTAG is the starting point for deciding whether a new transport projects should go ahead. This guidance enables schemes to incorporate the five ways of working in their planning, appraisal, delivery, and monitoring (as set out on page 50). We support the continuous review of that guidance alongside Llwybr Newydd and the training proposed.

Section 6 could be clearer under the five ways of working section (pp59-64) that embedding these in WelTAG is a key part of the implementation of the strategy.

Under the "Integration" section (page 63), we support the recognition of transport / movement as a single integrated system. NRW's recent State of Natural Resources Report has analysed global evidence around the climate and nature emergencies, and has concluded that one of the biggest opportunities for transformative change to tackle the climate and nature emergencies is the mobility system.
For more information: https://naturalresources.wales/about-us/state-of-natural-resources-report-sonarr-for-wales/sonarr2020-bridges-to-the-future/transforming-the-transport-system/?lang=en

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 have no comment on how this can be achieved in a fair manner to all.

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?

> We welcome that our comments submitted at the Scoping stage of the ISA Report have been acknowledged and included in the ISA Report.

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

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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?

> We have no comments on potential impacts on the Welsh language.

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.

> We have no comments on potential impacts on Welsh language usage and status.

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?

> We have no comments on potential impacts on people who share protected characteristics.

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?

> We have no comments on potential impacts on groups who share protected characteristics.

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 is significant infrastructure at the coast and historic events have shown that infrastructure is vulnerable to flood risk and coastal erosion. This has significant impacts in terms of maintaining connectivity and operational capacity. What isn't acknowledged in the WTS is that coastal assets that protect infrastructure may not be maintained in the longer term (Shoreline Management Plan (SMP) policies) and those that are in place will see their standard of protection reduced as a result of increasing Climate Change risks. The document should recognise this and plan accordingly. According to SMPs there is a need to adapt at the coast to provide a sustainable response to climate change pressures (primarily sea-level rise). In some locations, it will no longer be possible or sustainable to continue to defend. This means that defences may need to be set back (managed realignment policy) or that they will stop being maintained (no active intervention policy) and the standard of protection will reduce over time as the defence degrades and fails. This will affect communities, infrastructure (roads, rail, footpaths, utilities etc) and low-lying land adjacent to the coast. The SMPs indicate that there are 55 locations (sections of coast called policy units) which move from defence (hold the line) to either managed realignment or no active intervention between 2025 and 2055, and a further 37 locations where change is proposed between 2055 and 2105. Shoreline Management Plan policies can be accessed here
> http://lle.gov.wales/catalogue/item/ShorelineManagementPlan2/?lang=en.
> Network Rail recognise the climate change risks at the coast and the need to adapt. However, according to their Wales Route Plan, adaptation at the coast appears to be restricted to further investment in defence and resilience measures *in situ* rather than any consideration of realignment of assets in line with SMP Policy. We understand that this is in line with Network Rail's purpose to maintain the rail network. There is therefore a risk

that this approach is will have adverse effects on adjacent sections of coast, and on designated sites. Furthermore, over time the risks to these assets will continue to increase and ultimately it may not be possible or sustainable to maintain them in their current location. Given the scale and complexity of investment to deliver more sustainable transport infrastructure at the coast this requires action now to enable change to be managed in the medium to longer term.

Action E2 (page 20): Instead of the actions being focussed on having regard to "taking these issues/ considerations into account" we would recommend the wording is revised to a more proactive approach towards actions such as "we will explore opportunities to improve ecosystem resilience as part of the management of the transport estate and will encourage others to do the same".

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: