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Wales National Transport Plan 2015

Consultation Response Form

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Question 1: We have analysed a lot of data in developing the National Transport Plan. Do you feel there are any significant gaps in the data considered?

Yes/No: Yes

If yes, please explain the reason for your answer:

Overall Natural Resources Wales (NRW) considers that the National Transport Plan (NTP) covers important evidence and deals with high level issues. However there are some areas where important data and evidence has not been fully considered. Of particular concern is the consideration of evidence in relation to flood risk and the increased risk from climate change impacts, including flooding, coastal erosion and storm surges. Whilst there is acknowledgement that transport infrastructure in Wales will be at an increased level of risk the evidence base does not appear to consider the necessary data with regard to these areas. The key data sources missing are references to surface water risk and data on climate change for example, UKCP09 data.

We consider references to sensitive environmental receptors identified in the management plans of National Parks and Areas of Outstanding Natural Beauty (AONB) should be within the scope of the data sources analysed. Many parts of Wales, particularly in National Parks and AONBs, require a sensitive approach to transport planning in order to protect (and in some instances enhance) landscapes and cultural heritage assets. If the special features and qualities of these protected areas could be drawn out from these management plans in the evidence base it would provide an important context for transport interventions in these protected areas.

We note that there are not many references to the proposed National Development Framework (NDF) in the NTP. The NDF will be particularly relevant for the NTP in terms of setting out key areas for development. We

hope to see references to the linkages between the NTP and the NDF in future iterations of the NTP.

Natural Resource Management is evolving in the context of the proposed Environment Bill, and we would welcome a further discussion of natural resource management issues that could be considered as part of the evidence base.

Question 2: The Plan sets out the key findings from the evidence. Do you consider there are any key findings missing?

Yes/No: Yes

If yes, please explain the reason for your answer:

We draw your attention to the following:

We recognise that environmental impacts have been considered following an evidence based approach. It is not clear however where flood risk fits in and whether this issue is included as part of the 'supplementary information' and considered as a key finding.

Within the summary of proposed schemes, increased flood risk has been identified in a number of projects. Whilst the risk to the scheme itself has been identified along with the need to make the scheme resilient, the risks/impacts to third parties and the need to minimise these impacts as far as possible has not been acknowledged.

There is little reference to surface water flood risk, which can be a particular problem for highways. Surface water flooding is also likely to increase in future as a result of climate change due to increased rainfall events and intensities. As such, consideration of surface water flooding will also need to be given due consideration when designing new and maintaining existing, transport schemes.

Given that NO_x from road traffic is the reason why 35 of Wales's 36 Air Quality Management Areas have been declared, we would advise that a structured action plan should be in place to address this. We note the following statement 'As a number of the interventions are at the early investigation/feasibility stage there remains uncertainty as to what measures will actually be taken forward to delivery. This adds further uncertainty as to how meeting the objectives of the NTP will affect air quality'. We consider that this sentence should be reworded and suggest the following '*An Action Plan be put in place to address the issue of air quality, and keep under review the effectiveness of its planned interventions – paying particular attention to behaviour change.*'

In terms of adaptation to climate change the absence of any consideration of ports is anomalous given their vulnerability to coastal changes associated with

sea-level rise. In various places within the document climate change is referred to with certainty in relation to future climate, however in our view this should be properly referred to in terms of risk given the known uncertainties around seasonal trends. For example, Network Rail is undertaking risk and vulnerability assessments for implementing the necessary protection measures for their infrastructure. We advise that reference in the NTP to Port Authorities undertaking similar risk assessments within the lifetime of the plan should also be encouraged.

Whilst ports are currently not devolved to Wales we advise that in light of the publication of Powers for a purpose: Towards a lasting devolution settlement for Wales (February 2015) there is opportunity to consider the development of Welsh ports as part of wider strategies for economic growth and ensure port development is fully integrated into plans to improve Wales's transport infrastructure.

Question 3: Do the interventions address the findings from the evidence base?

Yes/No: No

If no, please explain the reason for your answer:

We do not consider that there is a strong correlation between the evidence provided and the schemes proposed.

Whilst we welcome the requirement for all new projects to be future proofed against climate change induced effects, we would also encourage any large scale maintenance schemes to also incorporate climate change resilience where possible.

In terms of legislation and policies, it appears that all those relevant to flood risk have been included. Good links have also been made to strategic policy drivers such as the Flood Risk Management Plans (FRMPs) and Shoreline Management Plans (SMPs)

With respect to greenhouse gas emissions reduction—the interventions that are likely to reduce NOx emissions (switch to public transport, and from road to rail) will also reduce greenhouse gas emissions. Big opportunities arise with the electrification of the main South Wales railway line, and of the South Wales Valleys rail commuter services. Reductions with the latter will be greater if the trains concerned employ regenerative braking, with electricity fed back to the grid. From 1971 – 1991 a freightliner container train service ran along the North Wales Coast to Holyhead. Four services ran daily, each loading typically to 25 wagons. The service was withdrawn as uneconomic, and now operates via Seaforth, Liverpool. It would be timely to assess whether or not the reintroduction of the service is now viable and whether some of the current HGV traffic could be transferred to container trains, with benefits for congestion and greenhouse gas emissions.

With the exception of the omissions already raised in our comments to question 2, the NTP has collated a good range of evidence but the interventions set out seem to have been developed with little consideration of the earlier evidence relating to climate change. The interventions are dominated by actions to address perceived road transport infrastructure deficiencies with no consideration of the potential for demand reduction across Wales and very little consideration of the potential for enhancing active travel with its resultant emission reduction and health benefits.

While the NTP references the Climate Change Strategy 2010, it makes no specific statement on the ability of the NTP to help deliver the 3% per annum reductions in emissions within the transport sector in Wales, nor does it explicitly set out how it helps delivery of the priorities for transport set out in the Mitigation Delivery Plan that accompanied the Climate Change Strategy.

We consider the case for the proposed road schemes set out in the NTP is based on projected increases in overall vehicle mileage which is not borne out by recent trends, nor is it consistent with the objectives of the Climate Change Strategy to reduce vehicle use through modal shift and improved use of communications technology.

We suggest an additional category beyond 'active travel' is 'reducing the need to travel'. The obligation to travel to work is reducing for some through computer-based home communications. We suggest that particular attention is paid to these recent and rapidly growing trends in the NTP. These may affect future transport growth forecasts.

Question 4: Are the delivery timescales appropriate (Section 3)?

Yes/No:

If yes, please explain the reason for your answer:

No comment.

Question 5: With regards to funding the interventions are there any other funding streams we should be considering (Section 4)?

Yes/No: No

NRW agrees with the funding sources outlined on pages 148 to 150. We agree with a structured method of assessing and prioritising projects and the funds that are planned to be drawn upon (such as the European funds) are likely to be amenable to this.

Question 6: 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.

We believe that the NTP could be strengthened by reflecting on:

- Strengthening the link between infrastructure investment and economic growth;
- Greater consideration of alternatives such as public transport, rail infrastructure, marine transport (ferries);
- Consideration of the integration of varying transport modes;
- The agricultural, energy and forestry sectors' importance to the economy of Wales;
- The need for transport infrastructure to be resilient to climate change.

We would welcome clearer linkages between the NTP and the land use planning system. We are particularly keen to see the interventions from this plan to be closely aligned with the emerging Environment (Wales) Bill, the Planning (Wales) Bill, the Well-being of Future Generations (Wales) Bill and the Wales National Marine Plan. For example, figure 1.3 (National Transport Framework) excludes the linkages to the land use planning and marine planning frameworks.

We welcome the following comment 'Transport projects often represent high or very high value for money when the value of the benefits, usually travel time and cost savings, are compared to the whole life cost of the project. In addition, transport schemes can boost the economy by improving access to jobs and assist in the realisation of the agglomeration benefits that arise from the close proximity of businesses.' It highlights the link between infrastructure investment and economic growth but this needs strengthening elsewhere within the NTP. Transport Planning is core to successful regeneration, connecting people to work, customers to suppliers and visitors to attractions. In Plan terms this means ensuring that non-transport aspects of regeneration are considered alongside transport planning and that the nature of transport planning may need adapting according to other aspects of regeneration to achieve multiple benefits. For instance many of our rural railway lines run through scenic areas where tourism is important and the approach to their operation needs adapting to support and encourage interest from visitors, perhaps learning from the successes of the larger heritage railways where the 'product' has far more benefits to society and local economy than just within the narrow confines of a means of travel from 'A' to 'B'.

We welcome the 'active travel' approach as described in section 3.6 and welcome the 'traffic-free' emphasis through working with Sustrans. However although we have some excellent cycleways in Wales we are aware that roll out of projects in many instances is unappealing to many users, particularly recreational users and families, because routes are sited on or very close to existing fast or busy roads. While any improvement to avoid cycling or walking on such roads is welcome, we do not think the full market for 'active travel'

would ever be achieved with this model of infrastructure provision. To make the plan work we therefore need commitment to, for instance, safeguarding and reusing old railways as cycleways and alignments and suitable grading of routes generally away from busy or fast roads. We would suggest that the NTP encourages modal shift by stating the commitment to 'active travel' away from busy main roads.

We would welcome an opportunity to discuss our points, and further detail, with you.

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: