

Consultation Response Form

Your name: Ruth Bradshaw

Organisation (if applicable): Campaign for National Parks

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Your address: all communication via email at present

Q1: Do you agree with our long-term vision?

Strongly agree	<input type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Strongly disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
No opinion	<input type="checkbox"/>				

Please provide your comments:

Q2: Do you agree with our 20-year ambitions?

Strongly agree	<input checked="" type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Strongly disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
No opinion	<input type="checkbox"/>				

Please provide your comments:

While it is good to see a reference to transport's role in the visitor economy in 2.3, it would be good to see something more specific in terms of measures to support sustainable travel by visitors to National Parks and AONBs, given that these areas make up such a significant proportion of the Welsh countryside and the proportion of leisure travel is forecast to increase even further in coming years. For example, there could be a specific reference to designated landscape in C2 which refers to using sustainable transport to access natural and cultural heritage opportunities.

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 do not disagree with any of the priorities but we believe that they need amending to ensure they cover visitor travel effectively. For example, priority 1 needs to be expanded to include a reference to ensuring the needs of visitors are considered when improving connectivity and developing new transport options, particularly in rural areas. In priority 2, 'innovative, flexible services that respond to demand' should play a key role in addressing visitor travel as well as people's everyday needs. In priority 4, incentives to encourage sustainable travel should also refer to measures which are relevant for leisure travel such as 'group discounts' 'rover tickets' etc.

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:

You have the right number of priorities and there is no need to refine them further.

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?

There is a need for some additional measures. M6 should be expanded so that it also includes monitoring the impacts of air and noise pollution on recreational users of an area as this aspect will not be captured by a measure focused solely on the impacts on households.

M15 should be expanded so that it specifically includes a measure of people's satisfaction with their access to designated landscapes.

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?

Identify the reductions in car use required in order to meet carbon reduction (and other relevant) targets and then use to develop specific targets for car reduction for particular types of journey e.g. work, education, retail, leisure etc.

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?

Additional actions are required. National Park Authorities (NPAs) should be added to the list of organisations with transport responsibilities included at the start of section 5 and there should be a specific action setting out how they will be involved in helping to deliver the strategy. While NPAs are not transport authorities, they are planning authorities and can use their planning policies to influence travel patterns. They also have a strong interest in improving sustainable travel as it makes such an important contribution to National Park purposes and it would make sense for them to take a strategic overview of how best to improve access for visitors to their area. Welsh Government has already specifically asked NPAs and AONBs "to seek to improve travel planning for visitor attractions and increase the use of demand responsive transport" in the Valued and Resilient Policy Statement published in July 2018 (<https://gov.wales/sites/default/files/publications/2019-04/areas-outstanding-natural-beauty-national-parks-2018-report%20.pdf>) so the Transport Strategy needs to include mechanisms to allow them to do this.

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?

The same issues that we have identified above apply to these mini plans. In addition there appears to be a lack of integration between the different plans. For example, while it is good to see a reference to more people using walking and cycling to visit National Parks by 2040, there are no priority measures included in the min plan for active travel to help

achieve this. In addition, there is a reference in the roads plan to reducing the impact of cars on National Parks by 2040 by promoting better local public transport links but there are no specific measures to help achieve this in either the bus or the rail plan. We note that Table 3.5 of the ITS recommends that changes are made to these mini plans to address these issues. For example with regard to active travel it notes that: “The mini plan includes mention that access to national parks and national cycle networks will have been improved but does not include a delivery plan to specifically address this. This could usefully be included specifically, e.g. the WTS will invest in the national cycle network.” We support this recommendation.

Part of the problem may be that the Active Travel Wales Act (2013) defines an “active travel journey” as a journey “made to or from a workplace or educational establishment or in order to access health, leisure or other services or facilities” and therefore, appears, to exclude journeys made to or from an area such as a National Park or other part of the countryside as well as those made in the course of visiting such an area. Given the importance of ensuring that such journeys are properly addressed in the Transport Strategy it might be better to re-name this mini-plan ‘walking and cycling’ instead of ‘active travel’ so that all types of journeys can be covered. Whatever it is called the mini plan must include measures specifically aimed at visitor travel to National Parks and other types of leisure journeys.

Similarly, there is a reference to more people accessing National Parks and outdoor recreation in the third sector plan but it is not clear how sustainable access will be supported. While it is really good to see such recognition of the importance of access to National Parks, this needs to be backed up with clear priorities for action.

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?

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?

Ensuring that there are good alternatives to the car available before charges are introduced; requiring the revenue generated to be invested in support for walking, cycling and public transport; and designing the charges so that they are targeted at journeys, locations and times where there is a particular need to reduce traffic.

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?

There are not necessarily gaps in the effects identified but we do not agree with the assessment of some of the effects of the proposed strategy, as set out in our response to Q10C.

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

We do not agree with the assessment of some of the effects as summarised in Table NTS-2 because the Strategy as currently proposed would not actually deliver some of the changes that are set out here. We have particular concerns about ISA objective 9: To protect and enhance the local distinctiveness of our landscapes and townscapes and ISA objective 13: To enable the protection of tranquil areas and prevention of noise and light pollution. In both cases it is stated that reduced car use would contribute to the achievement of the objective. However, as we have set out in our response to previous questions, while there is an ambition to increase levels of walking, cycling and public transport use by visitors to National Parks, additional measures are needed as part of the priorities and mini plans in order to achieve this. Without such measures, the ISA is not accurate assessment of the impacts of the Strategy.

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?

No comment.

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.

No comment.

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?

Certain groups with protected characteristics are currently under-represented among visitors to National Parks. While there are a variety of reasons for this, a lack of suitable transport options is one factor. Further measures are needed to increase the opportunities for those without cars to visit National Parks if the draft strategy is to deliver positive benefits for all the population.

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?

Please see our response to Question C above.

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

Please enter here:

The fact that many of those most in need of improved health and well-being have been excluded from National Parks as they can't get there is just one of the many inequalities in our society highlighted by the Covid-19 pandemic. There is an

urgent need to identify greater security of funding for existing public transport services in National Parks and to support new services in order to ensure that those who have missed out completely during the pandemic have more opportunity to visit once we are all able to travel more easily again.

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: