

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:

We welcome the analysis regarding walking trips to work and school highlighted on pp 21-23.

We would recommend that section 2.7 – accessibility is expanded to include access to local services such as GPs and shops by walking not just cars or public transport.

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:

In line with the Ramblers response we agree that it is disappointing to see the lack of emphasis on walking in the strategy. As highlighted in the document, walking accounts for 10.6% of journeys to work. It is a healthy, low cost or no cost option and benefits the environment through reduced pollution.

A National Transport Plan should include measures to improve the walking environment and encourage more people to walk as part of their daily routine. Initiatives such as Living Streets Walk to School programme and Walk to Work and Walk to School Week can make a real difference to both improving physical and mental health, reduced congestion and deliver economic

benefits.

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

Yes/No: Yes

If no, please explain the reason for your answer:

Within 3.7.1 we welcome the interventions proposed regarding active travel but are concerned by the lack of a specific timescale for delivery.

AT2.2 notes "*Deliver the actions set out in the Active Travel Action Plan*" yet the plan is still to be agreed. Once again we are concerned about the timescales involved.

Section 3.14.2 notes "*We have worked closely with the Children's Commissioner for Wales to embed this approach in strengthening the risk assessment of walked routes to school over the last year. As highlighted in the section 3.3.6, we are now working with schools on the trunk road to develop a programme of safety improvements.*" However the specific intervention merely refers to "*Revise the Travel Behaviour Code supported by the Children's Commissioner*". The intervention must ensure local authorities and schools work together to ensure walked routes to school are made safer for children to walking to school. The Code and supporting guidance sets the framework whilst local delivery is the implementation.

We welcome 3.7.1 ITC 1 - *Review travel planning interventions funded by the Welsh Government to ensure that they are focused and targeted appropriately* But believe this should be about delivery not just reviewing.

We welcome the reference to the role of active travel in section 3.24.4 IT1 - *Make grant funding available to local authorities for transport, including schemes that will help to improve access to employment sites, road safety schemes and schemes that will deliver the Welsh Government's wider priorities.*

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

Yes/No: No

If yes, please explain the reason for your answer:

As highlighted earlier we are concerned about the ambiguity of the timescale descriptors used against each of the interventions.

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

Yes/No: No

We welcome the line within AT1 regarding *Directing funding for walking and cycling to the delivery of schemes that contribute to active travel*

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 support agree with the concerns highlighted by Sustainable Transport Cymru regarding the Equality Impact Assessment. Specifically, that new road infrastructure provides a disproportionate benefit to certain population groups:

- Men drive nearly twice as many miles per year as women¹;
- Poorer people drive much less than richer people² (see Table). The bottom 60% of earners drive less than 55% as much as the richest quintile, with the poorest quintile driving less than a quarter of the distance of the richest;
- White people drive more than people from non-white backgrounds. 18% of people in the 'white' ethnic grouping do not have access to a car; this increases through 'non-white' ethnic groups to 44% of the 'black' ethnic grouping³;
- People who have never worked, and people who are long-term unemployed, drive an average of 903 miles per year. This is 16.3%⁴ the distance driven by the richest quintile⁵.

Income	Distance driven per	Distance driven as
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¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/243957/nts2012-01.pdf p13

² <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Table NTS0705, Travel by household income quintile and main mode/mode: England 2013 (no such information is available for Wales)

³ <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Table NTS0707, Adult personal car access and trip rates by ethnic group: England (no such information is available for Wales)

⁴ <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Table NTS0708, Travel by National Statistics socio-economic classification and main mode or mode: England (no such information is available for Wales)

⁵ Acknowledging a small proportion of double-counting because these terms are not mutually exclusive

quintile	person per year (miles)	proportion of highest income quintile (%)
Poorest	1,296	23.5
Second level	2,220	40.2
Third level	3,028	54.8
Fourth level	4,355	78.8
Richest	5,526	100.0

The Equality Impact Assessment undertaken by the Welsh Government, however, appears to show that equality is maintained by investing heavily in new road infrastructure⁶. This is a difficult conclusion to reach in light of the facts outlined above.

This means that any plan that disproportionately focuses on road infrastructure will tend towards *increasing* inequality, which would not conform with Welsh Government policy.

Governance

In relation to the wider delivery of transport policy, it is noted that specialist teams exist within Welsh Government for certain forms of transportation, in particular road and rail. However, there is no dedicated team for walking and cycling (active travel) – and given the passing of the Active Travel (Wales) Act 2013, it is our firm belief that a specialist delivery unit should be created to oversee best practice in developing funding and delivery models to ensure compliance with the Act and increasing coordination of schemes with other major transport projects e.g. active travel and public transport integration.

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:

Equal Opportunities Monitoring Form

⁶ <http://wales.gov.uk/docs/det/consultation/ntp/141210-ntp-eia-1-2-en.pdf> p8

The Welsh Government is committed to achieving equal opportunities in all its activities and responsibilities. This means taking action to ensure that all our services are accessible, and that all users of our services are treated equally.

The information you give us will be treated in confidence and will be used by our Team to provide statistics for equal opportunities monitoring to assess how our policies are put into practice.

We will keep this document separate from the Consultation Questions Form. We will treat the information you give in strictest confidence.

The Welsh Government carries out equal opportunities monitoring to collect information which will allow us to improve our services.

1. What is your sex?

Male

Female

**2. Can you understand, speak, read or write Welsh?
Tick all that apply**

Understand Welsh Read Welsh
Speak Welsh Write Welsh

3. Disability

Do you consider yourself disabled?

Do you have a work limiting health condition?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. What is your ethnic group?

- a. White
- b. Mixed/Multiple ethnic groups
- c. Asian/Asian British
- d. Black/African/Caribbean/Black British
- e. Other ethnic groups

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

5. What is your age?

Please specify

0 – 15 years
25 – 44 years
65 – 74 years

x

16 – 24 years
45 – 64 years
75 + years

Thank you for completing this form
