

## About you

Living Streets Cymru

## Your opinion

- 1. Are the transport emissions reductions targets, policies and proposals (set out in Prosperity for All: A Low Carbon Wales) achievable and sufficiently ambitious?**

Partly

### 1.1 Please outline your reasons for your answer to question 1

We warmly welcome the message of the transport section of the Plan that “The Welsh Government is putting Wales at the forefront of a shift towards active travel and a low carbon public transport system which is accessible to all and contributes to liveable and sustainable communities”. However, it is our view that the policies and proposals do not go far enough to set out or realise any clear ambition around active travel.

We welcome 'Proposal 13 Significantly increasing modal share of active travel for short journeys', however this is, to all intents and purposes, simply a commitment to review current ambition and targets for active travel. We would like to see the Welsh Government being more explicit as to how it plans to do so, beyond what is already being delivered and which has resulted in the currently low numbers of active travel journeys made.

We also welcome 'Proposal 1 - Design a public communications campaign to encourage people to use their cars less' and 'Proposal 12 - Working to achieve a modal shift from car dependency to sustainable forms of transport' and would welcome the opportunity as an interested stakeholder to further refine each of these proposals and develop them into Policy with the Welsh Government so that reduced car use becomes a solid corner stone of the next Wales Transport Strategy.

An integrated approach to sustainable transport is essential - walking is part of every journey and improving public transport alongside the walking environment enables people to travel further sustainably and make walking a bigger part of that journey. The Welsh Government has declared a climate emergency and we would expect proposals to reflect this boldly and with a sense of urgency.

The two active travel targets included in this Plan (only one for walking and one for cycling)\* are limited given that the baselines are already low and our view is that targets need to reflect much bolder ambition longer-term as part

of wider efforts to achieve a step-change in public behaviour and public health.

Living Streets warmly welcomed the strengthened position of the Welsh Government on active travel in Planning Policy Wales, December 2018. This approach must follow through into the debate around Decarbonising Transport and be subsequently reflected in the Wales Transport Strategy once published in 2020. We welcome 'Policy 49 - Use planning policy to promote sustainable travel and reduce the need to travel'. New infrastructure for active travel will not suffice if it does not address the many real and perceived barriers people experience which prevent them walking, in particular, where pedestrians do not feel that they are being prioritised. Issues such as poor crossings and wait times, obstructed footways, pavement parking, road layouts (including shared spaces) and speeding traffic are all some of the contributing factors that must be looked at in any new developments to ensure they are fit-for-purpose.

The City of London in its recent Draft Transport Strategy demonstrated excellent leadership in its approach to prioritising the pedestrian and in making the city a great place to walk and spend time by improving pedestrian comfort levels, making it safer, more accessible, easier and more enjoyable to walk in the city and cross its streets. It proposed targeting the proactive reduction in motor vehicle space and use on the City's streets and plans to reallocate space to pedestrians; using innovative methods to redesign the City's streets around people rather than vehicles and the use of temporary measures to create a culture and acceptance of future streets which are less vehicle focused.

This is the kind of ambition we would like to see matched within our cities in Wales based on a clear vision that genuinely prioritises walking and active travel for a healthier, fitter and cleaner Wales. Bold measures are essential if we are to reduce the dominance of the private car in Wales, especially for single occupancy and/or short journeys, and really maximise on the investment being made in public transport and Metro schemes across the country. Otherwise, there is a risk they are being set up to fail and business as usual shall prevail.

\*1 Double the percentage of adults making cycling journeys at least once a week (currently 6%) and increase the percentage of people making walking journeys at least once a week by 25% from the 2016 baseline

**2. Is the Welsh Government's vision for the decarbonisation of transport sufficiently innovative, particularly in terms of advocating new technologies?**

Partly

**2.1 Please outline your reasons for your answer to question 2**

The vision presented places much reliance on EV technology as an answer. Our view is that this should be pursued with caution:

- a) There is a risk of simply shifting the source of carbon-based energy where charging energy is sourced from the grid.
- b) The use of electric vehicles does not solve the problem of congestion on our roads, a burden to bus users, cyclists and pedestrians and a drain on the economy.
- c) Road safety is potentially further compromised through EVs, particularly for young children or the hard of hearing as it is more difficult to hear vehicles in the road.
- d) Electric vehicle charging infrastructure can be problematic if badly installed and can further obstruct active travel routes.
- e) EVs do not solve the problem of particulate matter vehicle emissions. Particulate matter is tiny particles of partially burned fuel, as well as engine oils, and tiny specks from tyres, brake discs and road dust. These particles worsen heart and lung disease. There is no safe level of particulate matter but the World Health Organisation (WHO) recommends keeping it below specific limits. WHO measured air pollution in 51 UK cities in 2016, and found that 44 of them exceeded those limits.\*\*

We welcome new assistive technology in vehicles such as intelligent speed adaptation systems that can automatically limit vehicle speeds. We would, however, urge caution in the pursuit of fully autonomous vehicles or reliance on a 'user in charge' due to pedestrian safety concerns.

We would like to see more innovation in active travel. Smart technology on pedestrian crossings can be used effectively to ensure that older people and physically impaired people have sufficient time to cross the road, something which is already being tested.\*\*\*

Smart ticketing systems will be essential to ensuring efficient and cost-effective use of public transport in Wales. This will make integrating active travel and public transport for all journeys a more convenient and attractive option.

We would like to see further reference to digital information and pedestrian wayfinding linking different transport modes and services to enable seamless travel through a combination of walking and other modes. This should include onward journey information on buses/train carriages on mobile app and on bus/metro stops, to make it easier for people to travel and make their connections on foot.

\*\*RCP (2018) Reducing air pollution in the UK: Progress report 2018. From: <https://www.rcplondon.ac.uk/news/reducing-air-pollution-uk-progress-report-2018>.

\*\*\*Charles Musselwhite Centre for Ageing and Dementia Research, Swansea University

### **3. What action is required, and by whom, to achieve the targets, policies and objectives?**

All proposals relating to modal shift and increasing active travel must be shaped into concrete policies without delay. Living Streets would be pleased to support this work.

We need investment in active travel. We support the recommendations made by the Future Generations Commissioner for 10% of the total transport budget to be spent on active travel by 2020/21, rising to 15% by 2025 given the health, environmental and transport benefits resulting from active travel. We would recommend a split between capital and revenue expenditure – ideally 70% capital and 30% revenue to start with. We would call on the Welsh Government to introduce a specific active travel to school fund which builds on, and includes, the current interventions in road safety (e.g. Kerbcraft and the National Cycling Standards) to establish a wider range of local interventions which can improve the health, environment and safety of children around primary schools, for example, to include interventions around air quality and wellbeing among others and which enable further active travel to school.

We need to make active travel the obvious choice for short journeys. Barriers to active travel need looking at in-depth to fully understand the blockages. For example, to enable more children to benefit from the daily walk to school, simply improving the routes between the home and the school may not be enough. With an increase in households where both parents go to work, schemes such as Park & Stride can help and in the longer term, public transport links and active travel routes on to key employment hubs are needed to achieve significant modal shift. For more recommendations on how to encourage mode shift read our report *Swap the School Run for a School Walk*.

Living Streets supports the move to greener vehicles, but guidance will be required to ensure good practice across Wales. Charging infrastructure should never be placed on the footway, as this restricts clearance, creating clutter and a potential trip hazard. It is dangerous for wheelchair users, elderly people, blind and partially sighted people and families with young children and pushchairs, who may be forced into the road. London Living Streets Group has produced detailed guidance on electric vehicle charging infrastructure.

There must be a default ban on all vehicles parking on the footway, as this discourages walking and, as with other forms of street clutter, is a safety hazard. We welcome recent steps taken by the Welsh Government to review pavement parking through its new Taskforce Group and look forward to contributing to the debate. Pedestrian Comfort Guidance recommends a minimum of 2m of unobstructed footway.

We welcome the recent commitment by the Welsh Government to make 20mph the default speed limit in residential areas. Slower speeds encourage people to walk and cycle more. We look forward to working with the Welsh Government towards implementation.

Where new infrastructure is being created, we would like to see that the absolute best street design and public realm is delivered for people walking, this could for example include aiming for +A pedestrian comfort levels for new infrastructure.\*\*\*\*\*

\*\*\*\*Living Streets (2018) Swap the school run for a school walk. From: [https://www.livingstreets.org.uk/media/3618/lis\\_school\\_run\\_report\\_web.pdf](https://www.livingstreets.org.uk/media/3618/lis_school_run_report_web.pdf)

\*\*\*\*London Living Streets (2019). Electric vehicle charging infrastructure. From:

\*\*\*\*\*TFL (2010). Pedestrian Comfort Guidance for London. From: <http://content.tfl.gov.uk/pedestrian-comfort-guidancetechnical-guide.pdf>.

#### **4. How should the new Wales Transport Strategy reflect the actions needed to decarbonise transport?**

The Wales Transport Strategy must set out a vision for transport in Wales that is forward looking, sustainable and effective. The strategy needs to outline a vision for a Wales transport system that offers real alternatives. One that people can get behind. It must provide realistic solutions to the barriers people feel are there which limit their options. Be clear that this is not about telling people they can't drive, but about ensuring that the alternative is a realistic, attractive, sustainable option for them.

This vision must be backed up with challenging targets that reflect a much-needed change in culture. The Wales Transport Strategy must have a wide range of active travel targets for the types of people we need to see walking more and the types of journeys we make, for example, children walking to school at both primary and secondary age, adults commuting to work, older people who are making local journeys in their community on foot, all short journeys of less than two miles made on foot.

The Wales Transport Strategy should ensure an approach such as Healthy Streets\*\*\*\*\* is embedded in all aspects of the delivery of the strategy. We would like to see tools such as the Healthy Streets Check for Designers or the Healthy Streets survey used to assess the impact of new developments in our towns and cities and that public health is considered to ensure it is truly embedded in the culture of future street development.

We would like to see bold measures such as the encouragement of a Workplace Parking Levy with employers offered a business support package of travel planning and parking management. In Nottingham, the WPL generates around £9m per year from more than 24,800 registered parking spaces, with surpluses ring-fenced for investment in public transport, including new tram lines, extending the bus and rail network, and investing in electric buses. The scheme has been very successful at reducing air pollution, encouraging mode shift, and funding public transport

improvements, and other local authorities are considering similar measures\*\*\*\*\*. The encouragement of Charging Clean Air Zones would also be a welcome move.

\*\*\*\*\*<https://healthystreets.com/>

\*\*\*\*\*Hallam, N. & Gibbons, A. (2017) A winning policy: Nottingham's Workplace Parking Levy.

From: <https://bettertransport.org.uk/blog/better-transport/winning-policy-nottinghams-workplace-parking-levy>.

**5. Do you have any other points you wish to raise within the scope of this inquiry?**

Living Streets supports the recommendations made by the Future Generations Commissioner for Wales in her report The 10-Point Plan to Fund Wales' Climate Emergency which suggests a minimum of 10% of the transport budget (20% of the capital budget) should be allocated for funding walking and cycling infrastructure - £60 million per annum, as opposed to the £60m currently allocated over three years.

We also agree with the recommendation to increase funding for public transport in order to enable more stages of journeys to be made on foot and for public transport and active travel to be meaningfully integrated. The recommendation is for at least 50% of the Welsh Government's transport capital budget to be allocated to improving public transport across Wales - £150 million allocation in the next annual budget.

We would further call for the Welsh Government to invest in revenue funding, beyond what is already being delivered, which will enable people to be better supported into making the lifestyle choices required if we are to realise a significant modal shift across the Welsh population. Capital funding is not going to achieve the required step-change without investing properly in promotional and behaviour change interventions to encourage people to use the infrastructure available.

We welcome acknowledgment that the third sector has a significant role to play in driving forward this agenda (page 47): "Third Sector and Local Leadership Voluntary organisations are uniquely placed to promote decarbonisation and influence others. Through awareness campaigns and education programmes the third sector can grow interest, helping people take personal pledges and commitments to reduce their emissions" and believe that the sector should be properly resourced to do so.