

# Report



## Cabinet Member for Infrastructure and Assets

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### Part 1

Date: 9 February 2023

**Subject** **Welsh Government Consultation Response – National Transport Delivery Plan**

**Purpose** To update the Leader and Cabinet Members on our proposed response to the Welsh Government Consultation regarding the National Transport Delivery Plan (NTDP) that sets out the proposed implementation of the Wales Transport Strategy and to seek approval to submit the response as attached as Appendix A.

**Author** Head of City Services

**Ward** All

**Summary** The Welsh Government published Llwybr Newydd - the Wales Transport Strategy (WTS) in 2021, which outlined a 20-year vision of the Welsh Transport system and its importance to address climate change. The WTS set out a hierarchy of modes that prioritises the most sustainable modes.

The NTDP sets out the Welsh Governments implementation plan for the next 5 years, recognising some aspirations are dependent on UK government legislation and / or funding. As such the plan as presented, is high level and doesn't represent a fully funded or committed plan. It does, however set out the likely funding priorities.

Whilst the general aspirations of the plan are consistent with Newport City Council's declaration of a climate emergency, some of the measures considered could result in unintended consequences for the city should they be implemented (for example local road user charging schemes).

Accordingly, the proposed response highlights our concerns where appropriate. Although the consultation has formally closed, the Welsh Government have granted Newport City Council an extension to reflect reporting and approval processes. This Paper seeks Leader and Cabinet Member approval to submit the response at Appendix A.

**Proposal** **This Paper seeks Cabinet Member approval to submit the response at Appendix A, which highlights key issues that impact on the Authority.**

**Action by** Head of City Services

**Timetable** Immediate

This report was prepared after consultation with:

- Leader

- Cabinet Member for Infrastructure and Assets
- Head of City Services

**Signed**

## **Background**

Llwybr Newydd, the Wales Transport Strategy, sets out the Welsh Government's 20-year vision for transport, recognising the impact on Climate Change. The declaration of a Climate Emergency places greater emphasis on travel choices, with modal shift to more sustainable modes a key target for the Welsh Government.

The National Transport Delivery Plan (NTDP) sets out the Welsh Government's proposed plan to implement appropriate elements of the WTS during the next five years. The consultation highlights some of the challenges in delivering the plan, including the role of UK government for non-devolved elements of the transport system.

The plan contains a comprehensive range of interventions to support the WTS priorities; however, it is noted these are not all fully costed or committed. The plan is therefore considered to set out the strategic priorities, subject to the availability of funding.

Whilst the aspirations of the plan are generally consistent with the Council's policies in respect of climate change, there are a number of proposals that could result in wider unintended consequences, in particular, consideration of Road User Charging. Whilst the implementation of such initiatives could provide an influence on travel behaviour and generate a revenue stream, there are concerns that implementation of local corridor or area schemes could be detrimental to those from lower income households and / or without access to a suitable alternative. Such schemes could also displace inward economic investment from the city.

The plan has been prepared in advance of the conclusion of the Roads Review, which has placed a moratorium on new road projects. As such, it is difficult to assess whether the plan strikes the right balance between modes.

Delivery will ultimately be dependent on the provision of funding and staff resources. Our response also notes the difficulties of developing long-term strategic planning against an annual funding cycle.

### **Financial Summary (Capital and Revenue)**

- The NTDP sets out the Welsh Government's proposed implementation of the policies and priorities contained in the Wales Transport Strategy over the next 5 years. The plan is not fully costed and partially dependent on UK Government funding. There are no changes to current budget allocations arising from the consultation.

### **Risks**

Our response highlights a number of potential risks of the proposed approach for consideration by the Welsh Government as part of the consultation process; therefore, it is not appropriate to develop a risk register at this stage.

### **Links to Council Policies and Priorities**

The provision of transport is key in supporting cross cutting council services and social inclusion. Increasing the use of more sustainable modes will support the Council's declaration of a Climate Emergency.

### **Comments of Chief Financial Officer**

The proposal in itself does not have any financial impact as it merely seeks approval to provide a response to the Welsh Government on the National Transport Delivery Plan. The response does highlight the need for more detail and certainty around funding which will need to be considered carefully in terms of the Council's Medium Term Financial Plan when this detail becomes available.

## **Comments of Monitoring Officer**

There are no specific legal implications at this stage as the Council is simply responding to the Welsh Government's consultation regarding their proposed National Transport Delivery Plan and the proposals for the implementation of the Wales Transport Strategy over a 5 year period. Any legal issues will be considered in relation to the delivery of specific elements on the NTDP in due course, when further detail has been provided. The underlying principles of the NTDP are consistent with the Council's well-being objectives and corporate priorities, particularly in relation to climate change and social inclusion. Therefore, the proposed NTDP is considered to be generally positive and is supported. However, the effectiveness of the delivery will be dependent on sufficient resources and capacity being made available on a longer-term, strategic basis, as opposed to annual funding. Also, further detail will be required to consider the implications of some measures, such as local road user charging schemes, to avoid any unintended consequences. These areas of concern have been identified in the propose consultation responses, where appropriate.

## **Comments of Head of People Policy and Transformation**

There are no staffing implications in this report. An FEIA is not required for a consultation response but will be for delivery of specific elements of the NTDP as these are confirmed. The principles of the NTDP are in line with Newport's well-being objectives and our climate change priorities and should support delivery of both of these. Where the NTDP potentially may not support these areas this has been identified in our response. Issues around the difficulty of long-term planning based on annual budget cycles has also been highlighted.

## **Comment of Non-Executive Members**

### Councillor M Evans:

The Conservative Group on Newport City Council share the concerns of the Leader and Cabinet Member in relation to congestion charging and workplace parking charges. As mentioned in the report such schemes could displace inward economic investment in the city and place us at a disadvantage with towns and cities where this would not apply. It is worth bearing in mind that the current moratorium on road building also has an effect on busses, coaches and taxis, and while the rail network has seen some improvements, we would like to see additional local stations built first. Road user charging will indeed have a greater detrimental impact on lower income households and those who have no option but to use a car. Social workers and carers for example, would be unable to carry out their duties effectively, like those who work for the night-time economy, because we do have a bus service than runs 24 hours a day. Finally, we cannot make long term strategic planning and procurement of capital investment projects on the back of annual transport grants. These need to reformed into longer term plans to mitigate the inherent risks.

## **Scrutiny Committees**

None undertaken to date

## **Fairness and Equality Impact Assessment:**

- **Wellbeing of Future Generation (Wales) Act**
- **Equality Act 2010**
- **Socio-economic Duty**
- **Welsh Language (Wales) Measure 2011**

At this stage the council is commenting on the Welsh Government's proposals for delivering the aspirations and priorities contained with the Wales Transport Strategy. There is no change to existing council policies or service delivery; therefore, the completion of a Fairness and Equality Impact Assessment (FEIA) is not applicable to our consultation response.

## **Consultation**

Consultation has been undertaken with the, Cabinet Member in the preparation of this draft

**Background Papers**  
Appendix A Draft Response

**Dated: 9 February 2023**

## Appendix A – draft response

### National transport delivery plan (NTDP): 2022 to 2027

Your name: Stephen Jarrett

Organisation (if applicable): Newport City Council

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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:

Q1. Do you think the plan will have a positive impact on the Welsh Government targets for creating modal shift to more sustainable forms of transport?

- very positive
- positive
- neutral
- negative
- very negative

Please provide comments and reasons for your response here:

The Plan contains a comprehensive list of interventions to provide greater opportunities to use more sustainable modes of travel. The breadth of interventions illustrates the complex range of influences on modal choice.

Ultimately, transport is a derived demand and travel needs are location specific; therefore, the challenge is to provide sustainable choices where possible. We are starting to see travel patterns crystallise as a result of societal changes following the outbreak of Covid-19, however public transport use remains significantly below pre-covid levels. Planning policies, including the move to regionally developed Strategic Development Plans, provide opportunities to support sustainable travel.

The NTDP includes consideration of demand restraint measures, such as Road User Charging and workplace parking. Whilst these provide opportunities to influence travel behaviour and generate revenue to support more sustainable modes, it is vital that the risks of unintended consequences are understood and mitigated, in particular those from lower income households and/or without access to a more sustainable alternative. These cost pressures are exacerbated during the current cost of living crisis. It is also imperative that sustainable options are provided in advance of charging schemes to genuinely influence behaviour.

Local schemes that are intended to address location specific issues can also introduce economic barriers, that can be counterproductive by displacing road travel to areas without the cost penalty (potentially travelling longer distances if the

overall cost is lower). Therefore, consideration of road user pricing needs to be at the national level.

Q2: Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

- very positive
- positive
- neutral
- negative
- very negative

Please provide comments and reasons for your response here:

The plan contains a number of proposals to directly reduce greenhouse gas emissions from the public transport motorised fleet, including decarbonisation of rail vehicles and 50% of the most polluting buses.

The greatest opportunity to reduce greenhouse emissions where travel cannot be avoided, is modal shift from single occupancy, ICE powered cars; therefore, measures to facilitate the use of alternatives are essential.

It will also be necessary to ensure that measures to promote alternatives do not increase congestion, as that will be detrimental to bus reliability and local air quality through increased idling. Congestion also has an economic impact that can reduce economic performance and the attractiveness of inward investment.

Ultimately the provision of options that meet user needs will determine the success of the plan.

Q3: To what extent, within the funds available, do you think the plan will meet the headline 5-year priorities set out within Llwybr Newydd: The Wales Transport Strategy 2021?

- fully
- partially
- in a limited way
- not at all
- unsure

Please provide comments and reasons for your response here:

Funding for transport infrastructure in Wales is a complex, with a number of funders, including UK government, Welsh Government, Local Government, transport operators and not least, the travelling public through fares. The plan itself highlights the ongoing discussions with UK government in respect of rail investment; therefore, there is a view current budgets do meet our shared aspirations to provide opportunities to make more sustainable travel choices.

As outlined in our response to Question 1, the plan contains a comprehensive range of measures, many of which require significant, long term investment in transport infrastructure. We are currently experiencing significant inflationary pressures, which reduces the 'buying power' of public sector funding.

The plan illustrates the need for long term capital and revenue investment, with many of the proposed measures spanning successive financial years and Senedd terms. We appreciate that funding cycles are also subject to UK Government funding decisions; therefore, there are inherent political risks that funding priorities may change.

The plan notes the limitations of annual funding cycles that are not conducive to long-term strategic planning and procurement of capital investment projects. The resultant system annual transport grants results in a limited period for implementation and does not enable long term contract price negotiation. This a particular issue during times of price volatility as we are unable to fix prices over a long period.

Whilst measures to provide enhanced infrastructure provision are welcomed, these need to be supported by ongoing maintenance and repair. Road user and workplace charging theoretically provide an avenue to generate a regular revenue stream, although this is subject to wider considerations, as demonstrated at the start of the pandemic where passenger transport revenues dropped by 95% overnight.

It is noted that transport use remains significantly below pre-pandemic level, with bus and rail services and airport infrastructure currently requiring significant financial support just to maintain a minimum core network of services due to the loss of passenger revenue. The funding required to sustain existing provision reduces opportunities to invest in network enhancements outlined in the plan that are required to attract modal shift.

Page 19 explains why it is not possible to publish a full Statement of funds available; therefore, it is difficult to make a fully informed assessment whether funds will be sufficient.

Q4: To what extent, within the funds available, do you think the plan will meet the well-being ambitions set out within Llwybr Newydd: The Wales Transport Strategy 2021?

- fully
- partially
- in a limited way
- not at all
- unsure

Please provide any further comments here:

In addition to our general funding comments in Question 3.

There is a concern that demand restraint measures, such as Road User Charging could reduce access to services for the least well-off households. Such schemes may also restrict the range of opportunities for employment, further education or leisure activities, all of which are key influences on personal well-being. Whilst we recognise the aspiration for an equitable scheme, this may introduce a significant administrative burden to public authorities.



All public sector transport schemes are required to consider the requirements of the Well-being of Future Generations Act.

Q5. To what extent, within the funds available, do you think the plan will meet the 5-year priorities set out within each of the modes and sectors mini-plans in Llwybr Newydd: The Wales Transport Strategy 2021?

- strongly agree
- agree
- neutral
- disagree
- strongly disagree

Please provide any further comments here:

There is limited granularity of the budget allocation against each of the priorities, therefore, it is difficult to make an informed assessment. It is appreciated that infrastructure and revenue support costs vary significantly between modes and a straight comparison of figures may not be appropriate.

It would be helpful if a table of projects and their indicative budget could be provided in future iterations of the plan.

Q6: Do you think the plan provides the right balance between the modes and sectors to meet the Welsh Government ambitions set out in Llwybr Newydd: The Wales Transport Strategy 2021?

Further to our response to Q5, there is limited consolidation of funding information, with the reader required to search the whole document to identify schemes where a budget figure is required.

The publication of the plan prior to the conclusions of the roads review also makes it difficult to assess whether the balance between modes is correct.

Proposals that have the greatest opportunity to achieve modal shift provide should provide the backbone of the plan; however these must be equitable to ensure those from least well households are not penalised.

Q7. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

The SAR outlines the requirements of relevant policies and legislation, including the Well-being of Future Generations Act. The schemes themselves will also be subject to WeITAG appraisal.

Q8. Do you have any further feedback or comments on the plan?

The plan outlines a long list of aspirations, which will take a number of years to deliver.

Newport City Council continues to work closely with the Burns Delivery Unit to implement a network of alternatives. The partnership approach adopted by stakeholders is critical to progress the recommendations. Local knowledge is vital in developing robust, evidence-based proposals.

We note the potential role of road user pricing to influence travel behaviour and aspiration to develop an equitable scheme for users. It is also important that any such schemes assess the potential unintended economic consequences of local / corridor schemes, which could make an area less attractive to inward investment.

Question A: We would like to know your views on the effects that the National transport delivery plan 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 specific comments on the propensity of people to use the Welsh Language. Any proposals would need to be consistent with Welsh language legislation.

Question B: Please also explain how you believe the proposed policy, National transport delivery plan 2022 to 2027, 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.

Please see our response to Question A above

Question C: 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:

The delivery of the plan will ultimately depend on funding and the availability of staff. It is imperative that the experience of local authority officers is maintained and expanded to ensure there is suitable capacity.