

**Date** 14th February 2024

Transport Action Network (TAN) Cymru

To: Transport Strategy and Policy Division, Welsh Government

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## **Subject: TAN Cymru Response to the National Transport Delivery Plan (NTDP) 2022-2027: 2024 Monitoring and Implementation Review**

### **1. Introduction**

TAN Cymru welcomes the opportunity to comment on the progress of the National Transport Delivery Plan (NTDP) 2022-2027. As we enter the second full year of this plan, Wales stands at a crossroads. The 2023 Roads Review set a world-leading precedent for climate-aligned infrastructure, but 2024 must be the year that "ambition on paper" becomes "shovels in the ground" for sustainable alternatives.

We remain concerned that while the "stop" has been put on damaging road schemes, the "start" for active travel and bus priority is being hampered by budgetary uncertainty and a lack of local authority capacity.

### **2. The "Roads Review" Dividend**

The cancellation or scaling back of major road schemes (such as the M4 Relief Road and the Flintshire Red Route) has in theory, at least, released significant capital.

- **Our Policy:** This "Roads Review Dividend" must be transparently ringfenced. We are alarmed by reports that this funding is being absorbed back into general highways maintenance or used to plug gaps in existing road projects.
- **Key Ask:** We call for a published ledger showing exactly how the capital diverted from cancelled road schemes is being reinvested into the Sustainable Transport Hierarchy.

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### **3. Active Travel: From Planning to Delivery**

The **Active Travel (Wales) Act 2013** is over a decade old, yet the "modal shift" remains stagnant.

- **The "Shared-Use" Problem:** We believe that the NTDP must move away from shared-use paths as a "default" solution. These can create conflict and do not provide the subjective safety required to get people out of cars.

- **Key Ask:** All NTDP projects for 2024-2027 should mandate physical segregation on primary routes. We also ask for an immediate "skills taskforce" to assist Local Authorities who lack the design expertise to deliver LTN 1/20 standard infrastructure.
- **20mph Integration:** The 20mph default is a vital safety foundation. The NTDP must now build on this by installing physical traffic calming and "Filtered Neighbourhoods" to prevent rat-running and to facilitate making walking the natural choice.

#### 4. Public Transport: The Bus Funding Crisis

2024 is a precarious year for Welsh buses. The transition from the Bus Transition Fund (BTF) to a more permanent settlement is fraught with risk.

- **Our Policy:** We cannot achieve the NTDP's goals if 20% of the bus network is cut due to a lack of revenue funding.
- **Key Ask:** We urge the Welsh Government to accelerate the **Bus Services (Wales) Bill**. In the interim, the NTDP must prioritise "Bus Gates" and "Strategic Corridors" to ensure buses are not stuck in the very traffic they are meant to reduce.

#### 5. Summary of Key Asks for 2024-2027

- A clear breakdown of the 62% of the capital budget previously earmarked for roads.
- Mandatory audits for all new schemes to ensure accessibility for disabled users and those with prams.
- A shift in the NTDP from "Urban Metros" to "Rural Hubs," focusing on small-scale interventions in market towns.
- Where Local Authorities fail to meet Active Travel duties, Transport for Wales (TfW) should be empowered to step in and deliver schemes directly.

#### 6. Conclusion

The NTDP is a document of great integrity, but it is currently being undermined by a "business as usual" approach in many highways departments. If the Welsh Government is serious about its Net Zero Wales targets, the remaining three years of this plan must be defined by a radical reallocation of road space and a relentless focus on delivery.

Yours Sincerely

Rhian Nowell-Phillips (Ms)

**Welsh roads and climate campaigner**

**TAN Cymru**