

Wales Transport Strategy consultation: response from Community Rail Network

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Response prepared by: Jools Townsend, chief executive

Organisation: Community Rail Network

Contact details: info@communityrail.org.uk or see communityrail.org.uk/about-us/meet-the-team

Office address (staff based in various locations): The Old Water Tower, Huddersfield Railway Station, Huddersfield HD1 1JF

About us

Community rail is a unique and growing movement comprising 73 community rail partnerships and 1,000 volunteer groups across Britain that help communities get the most from their railways. In Wales we now have **seven community rail partnerships (see map)** and **137 stations adopted** by the community, with further growth and development underway, supported by ourselves and Transport for Wales.

Community rail is about engaging local people at grassroots level with their railways, to promote social inclusion, empowerment and wellbeing, sustainable and healthy travel, and economic development. It is therefore extremely well aligned with the Wellbeing of Future Generations Act, and **enables our rail and wider transport network to be more inclusive, sustainable and community-orientated**. It involves working with train operators, local authorities and other partners to help communities have a voice in transport development, to achieve improvements to rail services and stations to meet local needs, and to enable more people to access and benefit from rail travel, especially in combination with active travel, buses and community transport.

Community rail is evidenced to contribute **high levels of social, environmental and economic value** to local areas. Studies estimate that volunteer activity alone is worth £33.2m annually in social value, while community rail partnerships are low-cost, high value ways to develop strong local relations. Rail patronage has risen markedly higher on lines with community rail partnerships, while countless stations have been transformed. Our evidence also shows profound, life-changing effects for individuals, such as for those supported to use rail to access new opportunities. Read more about the [value of community rail](#).

Established in 2000, Community Rail Network supports those working and volunteering in community rail and their partners. We **share best practice and connect community rail** partnerships and groups together, while working with governments at different levels, the transport industry, and voluntary sector to **champion community rail and share its insights** on sustainable and inclusive transport development.

As the umbrella body for a unique grassroots movement engaging local people with transport, we are drawing on a wealth of **local experiences, views and challenges** to inform this response – and we are enthusiastic about working with our members partners in Wales to support delivery of this strategy.

Response summary

We strongly welcome this draft strategy and its focus on creating transport system that is both inclusive and sustainable, aligning with the Wellbeing of Future Generations Act. We are pleased to see the importance of community engagement and empowerment, and the role of the third sector, recognised in a few places. However, we propose that integrating this commitment to local needs and empowerment across the strategy would itself have a powerful and enabling effect. We suggest below a range of opportunities for doing this, to strengthen the strategy itself, and ensure that it leads on to a delivery plan that can unleash the potential of communities to spearhead positive change towards a more inclusive and sustainable transport future. We also make a range of recommendations for ensuring that the importance of modal shift and modal integration is suitably emphasised throughout the strategy, so that it shows

strong and unambiguous leadership and helps to build momentum from this pivotal moment in time, as we recover from the pandemic.

Our recommendations for the strategy can be summed up as:

- **Expressly recognise the role of community engagement and the third sector** in not only running community transport schemes, but ensuring communities have a voice in transport development, highlighting local needs and opportunities, creating strong local relationships, and enabling more people to access sustainable travel
- **Align with behaviour change and sustainable development research**, especially by recognising that transport mode is generally not a matter of 'choice', and people must be engaged, supported and recruited to adopt more sustainable travel habits, especially through locally-led change
- **Show strong leadership on modal shift**, by more clearly setting out the need to reduce car journeys and flights, and challenging business as usual assumptions about car use
- **Reflect the importance of modal integration** and be honest about challenges to be overcome, steering a path towards more holistic transport thinking and working
- **Ensure that accessibility is seen in the widest sense**, and promote local engagement as a way to understand, appreciate and respond to the myriad of mobility barriers people face
- **Ensure a focus on our shared future**, painting a picture of positive change and the benefits we can achieve through shifting towards more sustainable transport development and behaviours
- **Usher in holistic, community-orientated, future-focused ways of thinking and working** - guarding against siloed and inward-looking ways of working in transport

Community rail in Wales is rapidly developing, with support from us and TfW, and increasingly focused on inclusion and sustainability, and helping rail to play a greater role in local development and wellbeing. Despite the pandemic putting many usual activities on hold, we and our members have been busy working toward playing the fullest possible role in the recovery of our communities and transport network from the pandemic¹ – and we are positive about the long-term importance of what we do. We also believe that community rail can offer many unique insights and examples that can support wider success across the sustainable transport field. We suggest in our answers below various ways that community rail, and our wider partners in the third sector, can play a pivotal role in the strategy's delivery, and point to ways the strategy could be refined to energise, enable and steer this work. However, most importantly, we look forward to continuing to work with colleagues at Welsh Government, TfW, the wider transport industry, and third sector, to bring the strategy to life and ensure its success on the ground.

Responses to questions

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

Strongly agree.

We enthusiastically welcome a vision for transport that puts people and their environment at the forefront, and a strategy that overtly recognises the great importance of accessible and sustainable transport, for current generations and for the sake of our shared future. Community rail experience consistently shows the life-changing and community-enhancing effects of making transport more accessible and sustainable, and ensuring that people can access sustainable transport.²

¹ See our briefing on Community rail's role in recovery, 2020, <https://communityrail.org.uk/wp-content/uploads/2020/09/CR-Network-Recovery-and-Renewal-Sept20.pdf>

² See the many examples in our report on Community Rail & Social Inclusion, 2018, <https://communityrail.org.uk/wp-content/uploads/2018/03/ACoRP-CRSI2018.pdf>

We note in the definitions that ‘accessible’ is meant in the widest sense: ensuring everyone can access transport. We welcome this, but advise that work is needed to help everyone in transport see ‘accessibility’ this way. Ongoing efforts are needed for the sector to get to grips with the myriad of inter-related physical, practical and perceptual barriers that people face, which extend far beyond stations and vehicles. We suggest the word ‘inclusive’ might also usefully be used in the vision, or else strongly reinforced in other parts of the strategy, given that it suggests not just people’s ability to ‘get to’ transport in a practical sense, but transport being welcoming, pleasant and equitable for all, at all stages of planning and making journeys. This ties in with commitments elsewhere in the draft, and questions C and D.

We also recommend that the strategy’s definition of ‘sustainability’ should overtly refer to the future, and protecting and safeguarding our shared future, and not just meeting present needs. This would help the strategy to align clearly with globally-accepted definitions of sustainable development,³ academic research on sustainability, and indeed the Wellbeing of Future Generations Act.

As we expand further below, effective community engagement, dialogue and listening – including through the community rail movement, and other third sector partners – can help transport providers and professionals to appreciate the many facets of ‘accessibility’, ‘inclusion’ and ‘sustainability’, by understanding what these ideas mean in practice, locally, on the ground, to ordinary people.

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

Agree.

We strongly support the positive framing across the four ambitions of transport being a force for good: for people and communities, environment, places and economy, and culture. Community rail experience clearly demonstrates the enormous benefits that transport can bring across these four spheres.⁴ We also welcome the suggestion of how delivery related to each of these four spheres is inter-related, although we suggest this could be made more overt, to help guard against siloed thinking and working, which has often been a problem in the transport sector.

In line with our comments above, we again suggest that at a high level, the summary of these ambitions should recognise the need to safeguard and benefit our future. It is especially important that this is explicitly recognised under ambition two, since being globally responsible entails helping to prevent catastrophic global heating and ecological collapse, which threatens us all.

We are impressed with the content explaining ambition one, and the nuanced understanding it demonstrates of barriers, perceptions, threats and opportunities. We especially welcome that this ambition is titled *people and communities*, and recognises the social importance of transport, enabling connections between people and creating a sense of cohesion and identity. Transport, and travelling to other places (locally or further afield), not only enables us to see friends and family, but reminds us and reinforces our place in the world and creates a sense of personal efficacy in relation to place, literally ‘broadening horizons’. We see this in the many examples from community rail of people of different ages and backgrounds being supported to try the train.⁵

³ As per Our Common Future (the Bruntland Report), 1987

⁴ These spheres echo the four pillars of the DfT’s Community Rail Development Strategy, which is adopted by the Welsh Government, showing how community rail and community engagement can support delivery across different aspects of the WTS’s delivery. See <https://www.gov.uk/government/publications/community-rail-development-strategy/connecting-communities-with-the-railways-the-community-rail-development-strategy>.

⁵ See p18-19, Community Rail Network, Value of Community Rail, 2019, <https://communityrail.org.uk/wp-content/uploads/2019/10/ACoRP-Value-of-Community-Rail-2019-final-for-web-141019.pdf>

Our one, important and overarching, recommendation for strengthening ambition one is that it explicitly acknowledges how important community engagement, and the community and voluntary sector, is to achieving these goals. Our members in community rail are continually engaging with local people, many of whom have never or rarely used rail, to help them feel confident and able to use rail travel, ideally in combination with active travel and buses, while feeding into rail and other transport partners how they can better meet local needs, be more inclusive and deliver greater social value through their activities. This work relates to and supports, directly or indirectly, everything listed on p15, and between us and our third sector partners at Transform Cymru, we are playing a vital role already, but could do more.

Under ambition two, we support the dual focus on being globally responsible while creating a resilient Wales, and the three aspects of decarbonisation, biodiversity and land use, and reducing waste. However, we urge that this ambition, and the decarbonisation description, recognises the need for modal shift away from widespread private car use (as is recognised elsewhere in the strategy) and flying.⁶ This section currently sounds as though the challenge of decarbonisation involves simply bringing down emissions of each mode, when a holistic approach across modes is needed to support shifts between them.

Also under ambition two, we recommend that the strategy acknowledges that decarbonisation relates not only to emissions from journeys themselves, but embodied carbon, and other social and environmental impacts from manufacturing and disposal of vehicles and the supply chain.⁷ We also advise that the statements about reducing waste should (a) acknowledge that sometimes new and additional infrastructure will be needed to enable decarbonisation through modal shift, especially as car-based infrastructure has been prioritised for so long, and (b) reference how transport can support low-waste lifestyles, such as by stopping use of single-use coffee cups, providing water fountains, and offering zero waste shopping at stations. We note that progress in installing water fountains at stations has been hindered by some train operators' targets to reduce water use. Drawing on community rail insights, we have been advising that stations can and should be beacons for sustainability within their communities, if we take a more outward-orientated view of how stations interact with their surroundings and communities, not only considering what happens within station boundaries.

We are very supportive of the content of ambition three, especially its recognition of: the challenges facing rural communities; the need to join up transport and planning (often not the case at present); shifting far more freight to rail, given the detriment that road freight causes to communities; and considering how innovation can support more sustainable, less car-dependent travel. We offer two suggestions to strengthen this section:

- Innovation should be seen not only as relating to (new) technologies: innovative solutions are often developed at community level through local people and partners coming together to consider local issues and opportunities, and so community engagement can play an important part in this. This may be especially relevant in rural areas, where bottom-up approaches may hold the key to creating more sustainable and inclusive transport systems that work for local geographies;
- We recommend this section explicitly recognises that sustainable transport and travel is good for business. In our experience, and from speaking to third sector partners working in active and sustainable travel, driving, cars and parking are often seen as essential for business locally, and this can get in the way of sustainable travel improvements. The evidence that walking, cycling and public transport is good for local business (and especially visitor economies) is often side-lined. We

⁶ The importance of reducing car journeys and flights is increasingly recognised by experts, researchers and decision-makers. See, for example <https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/1454/145408.htm>

⁷ Should all petrol and diesel cars in Wales be replaced with electric or ULEV cars, the manufacturing and import of these vehicles, the mining of lithium and disposal of batteries, represents a great deal of embodied carbon, and ecological and social detriment, in Wales and other countries. See, for example, <https://decarbon8.org.uk/greening-the-ev-transition/>, <https://www.theguardian.com/news/2020/dec/08/the-curse-of-white-oil-electric-vehicles-dirty-secret-lithium> and <https://www.theguardian.com/environment/2019/nov/25/are-electric-vehicles-really-so-climate-friendly>

suggest that this strategy could helpfully break down these ways of thinking, especially given the deputy minister's assurances in his foreword that this is 'not business as usual'.

On ambition four, we support this important recognition of the relationship between transport and culture, and are pleased to see the often-overlooked point about people being able to use sustainable transport to access sports, the arts and natural and cultural heritage. We would add that by shifting away from polluting and destructive forms of transport, it will help to preserve and enhance Wales' landscapes, nature and culture. Currently, high levels of traffic and congestion blight so many of our green and open spaces, historic towns and villages, affecting wildlife and people's ability to enjoy and access these places, as visitors and residents. We are also pleased to see C3 recognise the part that transport plays in local histories, and the need to protect heritage assets on the transport network, but we would add two points:

- Engaging and empowering local communities in the discovery, protection and enjoyment of local histories and heritage assets can deliver a multitude of benefits;⁸
- The transport network, and station spaces especially, can be used to celebrate local identities and encourage local creativity – and this can in turn build a sense of ownership towards rail, bus and sustainable transport.⁹ See the many examples of community rail art projects at stations.¹⁰

Q3A: Do you agree with our 5-year priorities?

Agree.

We broadly support all five priorities. However, we recommend they are strengthened in several ways:

- **Planning for better connectivity** – We support the explanatory descriptions on p25-26, explaining the need for modal shift and reduced car use, and the references to 20-minute neighbourhoods and ensuring good public transport/active travel links from housing and other developments. Community engagement, including through the community rail movement, can helpfully support locally-orientated sustainable development like this and ensure it works on the ground. However, we suggest that the title of this priority ought to more clearly reflect the underlying motivations described here, as 'better connectivity' could be interpreted as meaning road building and other unsustainable, car-orientated development. We also suggest that the wording 'planning for' may hold back the swift, urgent progress we need to decarbonise transport, and move decisively away from car-orientated development. We recommend that for the strategy to show strong leadership in supporting positive change at local level, this priority is reframed as 'Shifting focus to greener, non-car based connectivity'. We also suggest that the sustainable travel hierarchy on p27 should include, in between public transport and private ULEVs, community and shared transport schemes.
- **Public transport services** – we strongly support most of the contents of p28-30, especially its recognition of the great importance of public transport to people's lives, and the many benefits of enabling more people to use public transport. However, we again suggest that this priority could be more clearly and constructively titled to show strong and positive leadership, perhaps reflecting the sentiments at the top of p29, such as 'Public transport services everyone can use'. We also strongly recommend that the last two bullet points on p30 are improved:
 - Multi-modal integration is not only a matter of journey planning, although it's an important aspect. It also relates to: coordinated timetabling (often greatly problematic between rail and

⁸ See p22-25 of Community Rail & Social Inclusion, 2018, <https://communityrail.org.uk/wp-content/uploads/2018/03/ACoRP-CRSI2018.pdf>

⁹ See chapter on 'promoting positivity', p16-18, for an analysis of research and community rail examples showing why positivity is valuable in promoting sustainable travel: Community Rail Network (2017) *Communicating Community Rail* <https://communityrail.org.uk/wp-content/uploads/2018/02/CommunicatingCommunityRail-researchreport-2017.pdf>

¹⁰ As well as the report above, see our case studies, and filter 'arts and culture': <https://communityrail.org.uk/resources-ideas/case-studies/>

bus services, as our members commonly feed back, hampering connectivity and travel confidence in rural areas especially); good interchange, facilities, information and wayfinding at stations and stops; safe walking and cycling access to and from stations and stops; ticketing. The strategy could also acknowledge the value of developing multi-modal integration in a way that's informed and driven by communities and their input, linking to our point below;¹¹

- While we fully agree that public transport services should be shaped and informed by user feedback, engagement and input *from non-users* is just as crucial, especially if we are to encourage modal shift. Only by engaging widely with communities can we understand the practical and perceptual barriers people experience, and work with them and local transport operators to overcome these. This includes reaching out to and hearing from the many people who have not used public transport for years, the many children and young people for whom it is completely unfamiliar, and those who feel excluded from it and whose mobility suffers as a result. Community rail experience suggests we should not underestimate the scale of the challenge in reconnecting people with their public transport networks, building awareness and confidence, and in doing this we can also empower people and draw on their ideas and input.¹²
- **Safe, accessible, well-maintained transport infrastructure** – Again, we are highly supportive of most of what is described here. However, we advise that this section should also acknowledge the importance of multi-modal connectivity. For example, creating safe and good quality walking and cycling routes delivers enhanced benefit if those routes are well joined up with buses and trains, and this is not always the case. Again, community rail and community engagement can help with this.¹³ We also suggest that the first two bullet points could align better with the rest of the strategy by stating that when it comes to roads maintenance and development, clear priority will now be given to sustainable modes, according to the hierarchy, i.e. providing for walking, cycling and buses will take clear precedence over providing for cars. This could make a big difference in supporting progress at local level, which often suffer from car-orientated thinking.¹⁴
- **Making sustainable transport more attractive and affordable** – While we support everything included in this section, there are some important omissions, and the title of this priority could again be clearer, such as 'Supporting and enabling sustainable travel behaviours'. Drawing on a raft of academic research, this section is missing two crucial elements for achieving behavioural shifts: (a) ensuring that sustainable modes work well together, for seamless, stress-free, pleasant and accessible journeys, and to overcome the common barriers that poor integration poses; (b) local engagement, interaction and empowerment. Behavioural research is quite clear that we cannot simply 'persuade' people to make more sustainable 'choices', and warns against seeing people as merely consumers making economic decisions.¹⁵

Mostly, the way people travel and whether people travel is not a matter of free choice: it is greatly constrained and ingrained. When it comes to reducing car use, there are considerable emotional and cultural factors at play too: driving has become an embedded part of people's lifestyles and

¹¹ See our toolkit on community-led station travel planning, Connected Stations, for ways communities can engage with multi-modal integration at and around stations, and how this can ensure local needs are responded to:

<https://communityrail.org.uk/resources-ideas/reports-resources-tools/station-resources/connected-stations-a-station-travel-planning-toolkit/>

¹² See our appended briefing on behaviour change for the research basis for this (appendix A)

¹³ Again, see our toolkit on community community-led station travel planning: <https://communityrail.org.uk/resources-ideas/reports-resources-tools/station-resources/connected-stations-a-station-travel-planning-toolkit/>

¹⁴ See our appended briefing on integrated sustainable transport (appendix B) for community rail experiences

¹⁵ See, for example: Jaspal R., Nerlich B., Cinnirella, M. (2014) 'Human Responses to Climate Change: Social Representation, Identity and Socio-psychological Action'. *Environmental Communication*, 8(1), pp.110–130; Hoggett, P. (2013) 'Climate change in a perverse culture'. In Weintrobe, S. (ed.) *Engaging with Climate Change: Psychoanalytic and Interdisciplinary Perspectives*. Abingdon; New York: Routledge, pp.56-71.

identities, seen as a right, hence infringements can provoke defensiveness.¹⁶ In this way, seeing behaviour change as being about persuading people to make different choices may be counter-productive, and this is why community engagement is so critical. Alongside enabling wider access to sustainable travel and removing practical barriers, we need to align sustainable travel with local values and identities and ‘recruit’ people socially to more sustainable habits.¹⁷ This is best conducted locally, within and with communities, putting local people in the driving seat of change as much as possible (excuse the pun). Hence community rail invariably produces positivity, efficacy and momentum through its activities, not a backlash for being ‘anti-car’. This aligns with a raft of research suggesting that our best hope for bringing about more sustainable behaviours is locally-led change and engagement.¹⁸

We therefore recommend this section should include a commitment to **‘Support and nurture community engagement and locally-driven projects** that create pride, awareness and ownership around sustainable transport, as well as spearheading practical changes that meet local needs, such as those delivered through community rail or local active travel campaigns’. We also suggest that the last point on p36 is reworked slightly: we welcome this recognition of the need to engage and hear from young people, but suggest this is framed in a more engaging and empowering way, so it doesn’t risk being interpreted as top-down and one-way.¹⁹

- **Support innovations that deliver more sustainable choices** – As per our comments above, we (like many behavioural researchers) caution against putting this emphasis on choice, for reasons we have described. We would also point out that ‘innovation’ (as per the title of this priority) includes much more than technology (the sole focus of the content within the section). Innovation often occurs when people with different perspectives come together, including to address issues at a local level. In fact, many sustainability experts and academics warn that we should not put all our hopes in technology to ‘save the day’. Instead, the value of community-level and community-driven change is emphasised by many, including in ensuring that technological development produces best results on sustainability. For example, Dale et al argue: “It is at the community scale that the application of innovation, technological and social, occurs most effectively, and, when aggregated, has the greatest impact in increasing sustainability at a broader scale... Community vitality...is a key

¹⁶ See, for example: Murtagh, N., Gatersleben, B. & Uzzell, D. (2012) ‘Self-identity threat and resistance to change: Evidence from regular travel behaviour’. *Journal of Environmental Behaviour*, 32(4), 318–326; Steg, L., Vlek, C. & Slotegraaf, G. (2001). ‘Instrumental-reasoned and symbolic-affective motives for using a motor car’. *Transportation Research Part F: Traffic Psychology and Behaviour*, 4, 151-169; Gatersleben, B. (2012) ‘The psychology of sustainable transport’, *Psychology*, 25, pp. 676-679, <https://thepsychologist.bps.org.uk/volume-25/edition-9/psychology-sustainable-transport>; Goodwin, P. and Lyons, G. (2010) ‘Public attitudes to transport: interpreting the evidence’, *Transportation Planning and Technology*, 33:1, pp3-17.

¹⁷ See Strengers, Y. and Maller, C. (eds.) *Social practices, intervention and sustainability: beyond behaviour change*; Shove, E. (2010) ‘Beyond the ABC: climate change policy and theories of social change’. *Environment and Planning*, 42, pp.1,273-1,285.

¹⁸ For example: Dale, A., Ling, C., Newman, L. (2010) ‘Community Vitality: The Role of Community-Level Resilience Adaptation and Innovation in Sustainable Development’, *Sustainability*, 2, pp.215-231; Klein, N. (2014) *This changes everything: capitalism vs the climate*. London: Allen Lane; Moser, S.C. (2010) ‘Communicating climate change: history, challenges, process and future directions’. *Wiley Interdisciplinary Reviews: Climate Change*, 1(1), pp.31-53; Schatzki, T. (2015) ‘Practices, governance and sustainability’. In Strengers, Y. and Maller, C. (eds.) *Social practices, intervention and sustainability: beyond behaviour change*. Abingdon; New York: Routledge, pp.15-30; Shove, E. (2010) ‘Beyond the ABC: climate change policy and theories of social change’. *Environment and Planning*, 42, pp.1,273-1,285; Walker, G. (2015) ‘Beyond individual responsibility: social practice, capabilities and the right to sustainable ways of living’. In Strengers, Y. and Maller, C. (eds.) *Social practices, intervention and sustainability: beyond behaviour change*. Abingdon; New York: Routledge, pp.45-59; Todhunter, T. (2011) ‘Low-carbon Communities: A Grassroots Perspective on Public Engagement’. In Whitmarsh, L., O’Neill, S. and Lorenzoni, I. (eds.) *Engaging the public with climate change: behaviour change and communication*. London; Washington: Earthscan, pp.252-269; Weintrobe, S. (2013) ‘Introduction’. In Weintrobe, S. (ed.) *Engaging with Climate Change: Psychoanalytic and Interdisciplinary Perspectives*. Abingdon, Oxon; New York, NY: Routledge, pp.1-15.

¹⁹ See our recent report on youth engagement with rail, with a range of recommendations relevant to engaging young people with all forms of sustainable transport: <https://communityrail.org.uk/youth-engagement-in-rail/>

element.”²⁰ We therefore recommend that the role of community engagement is again acknowledged in this section, including in informing and inspiring technological development.

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.**

Agree.

Although we recommend various refinements to the naming and content of the five existing priorities, on balance we think these represent a good number, and a range of short to medium time priorities. However, we do recommend that the five priorities should be more overt about the pressing need to support and enable modal shift, and suggest the sentiments in point 2 above should be incorporated into the fourth priority, renaming it **‘Supporting and enabling sustainable travel behaviours’**.

In terms of reducing the need to travel, clearly there is a balance to be struck and caution is needed so as to not further limit people’s mobility or self-efficacy. We are well aware, through community rail experience, and our partners at Transform Cymru, that inclusive mobility and access is essential to social and economic development, and people’s health, wellbeing and fulfilment – and currently many people’s mobility, especially the most poor and vulnerable, is limited. We also know that journeys that may seem ‘non-essential’, if taken by sustainable means, such as leisure trips by train or bike-rides, can be hugely beneficial to individuals and the places they visit. In some cases, such trips may deliver much benefit without contributing additional emissions, and certainly in the wake of the pandemic, encouraging leisure journeys by public transport, walking and cycling will be critical to the recovery of our transport networks as well as helping people’s health and wellbeing. In order to achieve the other priorities of the draft strategy, and support a green and inclusive recovery, there may be a need to significantly increase journeys by some modes. We suggest, therefore, that the strategy should simply be clear that it is aiming to reduce journeys by two modes only: private car and flights.

Q4: We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

No.

We strongly welcome the commitment to set up a National Travel Survey and support the use of metrics like this to assess progress, but we have a number of comments and suggestions, especially to make these metrics more useful in shaping and informing an evolving, intelligence-led approach:

- M1-4 – these metrics completely ignore those not using or excluded from certain modes at the moment, and the propensity for change. For example, asking existing rail users if they are satisfied with their journeys tells you little about people who aren’t making those journeys due to practical or perceptual barriers, possibly with strong feelings of dissatisfaction about those issues. Similarly, hardened cyclists may tell you they feel fairly safe as they have got used to cycling along a stretch of road, but there may be others who would like to cycle but don’t dare. These metrics also don’t capture anything about people’s ability to influence or have a voice on transport development, as

²⁰ Dale et al, 2010, Community Vitality: The Role of Community-Level Resilience, Adaptation and Innovation in Sustainable Development

the draft strategy (and research) acknowledges is important. They also fail to assess problems or progress with modal interchange, or people's ability to use public transport in combination with active travel, for healthy and sustainable end-to-end journeys. We recommend these metrics are improved in these ways, to align with the five priorities, but we also advise that they are accompanied with qualitative analysis (see below);

- M5 – metrics on emissions should take into account embodied carbon, and other environmental impacts from manufacture, import and disposal of vehicles and materials;
- M8 – this should also look at waste created on the transport network, taking a holistic view of transport waste; this will help to inform efforts to assist transport users to reduce waste;
- M10 & 11 – in line with the stated priorities, these measures should especially look at delays and infrastructure/vehicle quality affecting users of sustainable, non-car based modes, so these issues can be addressed in a needs-orientated and intelligent manner;
- M9 & 15 – we suggest specifically measuring whether people are able to access services, cultural attractions etc via sustainable (especially non-car based) means, in line with the modal hierarchy and to inform progress on modal shift;
- M16 – we recommend assessing not only heritage assets but community arts and culture projects that have taken place on the transport estate or been supported by the transport sector.

On top of these improvements, we urge that quantitative assessments should be accompanied with qualitative evidence and analysis, particularly given the critical behavioural and social aspects of this strategy. Surveys are useful in providing larger quantities of data, and can be especially helpful in understanding existing behaviours across the piece. However, they are less helpful in understanding people's views and feelings and propensity for change, providing only a superficial snapshot of opinions, which are fluid, complex and hard-to-pin-down. We recommend therefore that qualitative methods such as focus groups, case studies and interviews are used alongside. We also strongly urge that these methods are not simply focused on asking existing transport users what they think about those modes. As discussed above, engaging widely with communities, including drawing on non-users' views, is extremely important.

Given the evidence on the importance of locally-driven change discussed above, we also suggest Welsh Government should be assessing the extent to which communities are able to spearhead successful change. For example, it could collect case studies on local sustainable travel initiatives, including feedback from community groups and local authorities involved, levels of success, barriers they faced and lessons learnt. This would enable evaluation of whether the strategy is working in enabling and supporting local change, and, most importantly, identification of lessons to inform the next five-year priorities, and sharing of good practice between communities. We suggest that Wales' community and voluntary sector involved in transport, including community rail, could offer some vital assistance in these endeavours, both in supplying case studies, feedback and lessons from local projects, and advising on, feeding into and possibly assisting with public-facing qualitative methods. This is something we do as a matter of course with our members in community rail. We suggest this should be discussed with the Transform Cymru network.

Q5: Do you think we should include specific targets for more people to travel by sustainable transport?

Yes.

Q6: We have identified a set of actions to deliver the draft strategy. Are they the right actions?

Yes.

We support the statements on p49 about sustainable investment, including ensuring focused investment in modes the strategy seeks to create a shift towards, and working with the UK government on rail to ensure local communities' needs are understood. On the former, we suggest that this will involve a major shift in the balance of investment across different modes, and ask whether the strategy should more

overtly acknowledge this. We also suggest this section might acknowledge the process of rail reform being led by Westminster over the coming years and opportunities this may present for making our railways more community-orientated and responsive. We are currently advising the DfT on ensuring that the position of community rail is safeguarded through this process, but also how insights from community rail can be used to make our railways more responsive to local needs.²¹

On p50, the strategy talks about grant funding for schemes, and ensuring more inclusive design. We recommend that both these sections acknowledge the role of the community and voluntary sector, and importance of community-led schemes for ensuring local needs are understood and responded to. Grant funding could specifically encourage community involvement and community-led improvements, while design principles and guidance could highlight the valuable role of local engagement in ensuring designs are inclusive and work on the ground. By involving communities in improvement schemes and allowing local people to influence and steer such schemes, the benefits are magnified through the involvement itself supporting local cohesion, wellbeing and empowerment, and people are more likely to be aware of, feel ownership towards, and thus use, infrastructure enhancements.²²

We note the various delivery and action plans set out on p51-52; we and our members will be keen to feed into these in more detail on how community rail can support delivery across Wales. We note the demand management plan referenced and welcome this, however we recommend that this should reflect the complexities of achieving behavioural shifts, as discussed above, drawing on qualitative research and working with behavioural academics to map and better understand the opportunities for encouraging and supporting such changes.²³ Partnerships with universities leading work on sustainable travel could also support the robust data gathering and evaluation described on p56.

We welcome the emphasis on working in partnership on p53, and especially the recognition of the need to work with education, health planners, local authorities and the third sector. However, we advise that the last two bullet points on this page could be significantly strengthened, to (a) recognise the need to engage and listen to not only existing transport users (as we discuss above), but to engage holistically and widely with communities as a whole, including those currently marginalised or disenfranchised from (sustainable) transport, and (b) put the role of community and voluntary sector in achieving this centre-stage, noting not only third sector transport operators, but the many community groups that otherwise engage with transport, or might do so in the future. For example, these bullet points could be improved as follows:

- “do more to involve communities and transport users, including people currently excluded or limited in their use of sustainable transport, by supporting local community and voluntary sector involvement in transport, and creating a representative transport advisory group for Welsh Government who will play a critical role in taking this strategy forward.”
- “strengthen our engagement with commercial and third sector transport operators in Wales in conjunction with other areas of Welsh Government including Business Wales, and support initiatives that connect and involve local communities with transport, such as community rail partnerships.”

Q7: We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these?

Yes, but with improvements recommended below.

²¹ See our input to the Williams Rail Review: <https://communityrail.org.uk/wp-content/uploads/2019/01/RailReviewEvidence-fromACoRP-Jan19.pdf>

²² See our toolkit on community-led station travel planning, Connected Stations, for ways communities can engage with multi-modal integration at and around stations, and how this can better meet local needs: <https://communityrail.org.uk/resources-ideas/reports-resources-tools/station-resources/connected-stations-a-station-travel-planning-toolkit/>

²³ See our appended briefing on behavioural insights (appendix A)

We provide a few suggestions below on the active travel, bus and roads mini plans, given the ways that community rail is increasingly working across modes to support and enable sustainable end-to-end journeys, and given the lessons to be derived from community rail experience that might support active travel and bus development. We also provide some brief remarks on the aviation plan, given the evidenced importance of shifting journeys from air to rail to enable decarbonisation. However, we naturally focus in more detail on the rail and third sector mini plans.

Active travel – We suggest that sometimes seeing ‘hard’ and ‘soft’ measures as entirely distinct (as per p66) can be unhelpful: as described above, by involving local communities in infrastructure and service developments, we can ensure that ‘hard’ measures are well suited to local needs, while creating awareness, ownership and positivity. We welcome that this section includes a nod to active travel being used in combination with public transport, but suggest that this needs to be emphasised far more, with greater attention to connecting up active travel infrastructure with stations and other public transport facilities. In our experience, active travel access to a great many railway stations, especially in rural areas, remains inadequate, with unsafe, poor quality or non-existent routes hampering sustainable access. We also see an ongoing focus among many of our rail partners on providing car parking at stations, rather than prioritising enabling sustainable and healthy access for all. A challenge for this strategy is to re-set priorities and get over the perception that driving is the only option in many places. As the strategy recognises, this perception excludes and dismisses the large minority who don’t have access to a car, and quashes the scope for innovations that can open up sustainable mobility to more people. We recommend that the vision for active travel (partly not visible on this draft) is reworked to make clear that active travel is not only for use over shorter distances, but vital for starting and ending longer sustainable journeys.

Bus – We warmly welcome the ambition to ensure that everyone is, and feels, able to hop on a bus, and echo the important points on p70 that confidence and other perceptual problems and misgivings pose a major challenge to be overcome across public transport, especially post-pandemic. We also welcome the recognition here that nearly a quarter of adults in Wales don’t have personal access to a car, and therefore the importance of buses to them. We suggest that this important point could be more clearly reflected throughout the strategy, which often reads as though car ownership and use is the norm, when normalising public transport use is a big part of what we need to do. We strongly support the vision on p71 and its focus on reliability, coherence, integration and affordability, all of which we know to be critical factors in whether people feel able to use public transport.²⁴ However, while the word ‘integrated’ is used in the vision, we cannot see anything in the contents of this mini plan that takes this forward: we suggest some priority actions are needed on this. By better integrating bus services (with other services by different operators, with rail, and with walking and cycling provision), greater value can be derived from them by local communities, even before any additional investment is made, and public transport can be opened up to much wider audiences. Yet integration of rail and bus especially continues to be deeply problematic locally.²⁵ We strongly advise, therefore, that the priorities on p72 should include (ideally at the top of the list) to “work with operators, local authorities and empower communities, to encourage improved bus timetabling and routing that aligns with other bus services, rail, community transport, and active travel routes, and to overcome modal integration problems”. Measure related to improved integration, and community involvement and feedback on this, should also be included.

Rail – We warmly welcome the recognition on p74 of the importance of the Welsh rail network, and challenges to be overcome to do with past under-investment; we suggest that railways should be seen as the backbone of a sustainable transport network. We cannot comment fully on the vision for this mini plan as part of it is not visible on this draft, but we support the slant on meeting local needs, and enabling more people to travel by rail. We suggest that the same focus on integration and coherence needed in the bus

²⁴ Reinforced through community rail experience on the ground, and Transport Focus’s range of research on rail and bus use

²⁵ See our briefing on integrated sustainable travel challenges and opportunities in community rail (appendix B)

mini plan vision should be echoed here for obvious reasons. We broadly support the objectives set out on p75, but make a few recommendations for strengthening these:

- Under equality and health, we strongly welcome the focus on making rail more inclusive, but suggest that the role of community engagement and dialogue is recognised here, ensuring that rail is understanding of and responsive to local needs. This could be an additional bullet point reading “communities are engaged as partners in local rail and station development, drawing on local views and responding to local needs”;
- Under environmental impacts, we recommend an objective is included for increasing the modal share of walking, cycling, buses and community transport to and from railway stations;
- Under economy and places, we suggest the second bullet point is reworded to be in keeping with this strategy’s focus on sustainable development (as distinct from ‘growth’, a focus on which tends to produce non-sustainable forms of development), and to recognise how stations can be beacons for sustainability and hubs for communities. Drawing on community rail’s extensive experience in transforming stations into thriving, valued, well-used, and central spaces for their communities, often rejuvenating disused spaces and buildings,²⁶ we advise this point instead reads “stations, new and existing, are brought into the heart of communities, through local engagement and station friends groups, and bringing un(der)used spaces into productive community use”;
- Under culture and language, we suggest an additional bullet point, in line with our comments above, “stations and railways are used to celebrate and involve people in local histories and identities”.

We also largely support the priorities on p76, but suggest these are overly insular and inward-looking, rather than seeing rail as part of a wider, coherent sustainable transport system, as the strategy aspires to. The language in bullet point one pulls against the idea of rail being more inclusive and available to wider groups by referring to the ‘experience’ of, presumably current, passengers. While ensuring existing passengers are happy is clearly important, in a post-Covid-world especially, where few people have been using public transport, rail must reach out to wider groups, to promote wellbeing and mobility, and secure a green and inclusive recovery. It is predicted that commuting and business travel will never return to post-Covid levels, and so rail must work to achieve a far greater modal share of leisure travel, and the freed-up capacity provides an opportunity for this. Given that the biggest proportion of private transport emissions are from longer leisure journeys,²⁷ switching these to rail is a chance to make a big contribution to the environmental impact of transport in Wales. We recommend that these priorities are re-worked to reflect this current context, and the need for rail to be better integrated, more inclusive, more outward-looking.

Finally, we would very much like to see the community rail movement referenced in this mini plan, including in the ‘Involve’ point under ways of working. Community rail is a well-established, growing and successful network that exists precisely to involve local people with their railways and stations. As per the DfT’s Community Rail Development Strategy, which was adopted by the Welsh Government, community rail’s role is to: help communities have a voice (e.g. in rail development), promote sustainable and healthy travel, promote diversity and inclusion, and support social and economic development.²⁸ We now have seven community rail partnerships in Wales, and 137 Welsh stations adopted by local volunteers. The movement’s growth and development continues to be supported by Community Rail Network, working closely with TfW and supported by Welsh Government. Community rail can therefore play a crucial role in the delivery of this strategy, in helping rail to be more inclusive and needs-orientated, in supporting and spearheading better modal integration and behavioural shifts, and in sharing its unique insights and experiences across the transport sector.

²⁶ See Community Rail Network’s report on Community Stations, 2017, <https://communityrail.org.uk/wp-content/uploads/2017/04/ACoRP-Community-Stations-Document-web.pdf>

²⁷ Professor Greg Marsden, University of Leeds

²⁸ See DfT, Community Rail Development Strategy, 2018: <https://www.gov.uk/government/publications/community-rail-development-strategy/connecting-communities-with-the-railways-the-community-rail-development-strategy>

Roads, streets and parking – We support the emphasis here on improving active travel and bus provision on roads, but suggest this change in priority could be emphasised more clearly, such as in the vision on p79, and in the priorities and ways of working on p81. It should be recognised that locally, the car has taken precedence, for decades, very often stymieing community efforts or silencing demands to improve walking, cycling and public transport (for example, if cycle paths, pavements and crossings are seen as taking away space from, or slowing down, drivers). These issues continue to this day, although the pandemic offers particular opportunities to instigate change; a major shift in thinking, culture and decision-making is needed to support this strategy's success, and this ought to be recognised here. This is an area where a strong and positive vision is especially important, showing how pleasant and wonderful our streets and communities can be with fewer cars (something people have glimpsed through lockdown), and how space previously given to vehicles can be used productively. We suggest this mini plan and its vision could be strengthened considerably towards this.

Third sector – We warmly welcome the inclusion of a third sector mini plan in the strategy, recognising the crucial, often unsung role of volunteers in both (a) delivering transport services, and (b) engaging local communities with transport and its sustainable and inclusive development. However, this latter aspect of third sector work – engaging communities and ensuring their voices are heard – isn't as well-acknowledged and developed in the mini plan as the former, despite the opportunity for community engagement to support and underpin so many other aspects of this strategy. While we are delighted to see the valuable work of community rail partnerships recognised in the introduction on p82, this description isn't as fully representative as we would like of community rail's role, and there are many other parts of the third sector that are omitted. We propose, therefore, that this introduction is reworked (perhaps consulting Transform Cymru), with one paragraph summing up the role of communities in delivering community transport, and a second paragraph summing up its role on engagement, which might say something like: "Wales also benefits from a widespread network of community groups and partnerships involving and empowering local people with different aspects of transport and its development. These include: community rail partnerships, providing a positive link communities and their railways, and promoting rail travel; station friends groups, running volunteering and community activities at stations; walking and cycling groups; passenger user groups; climate action and other campaigns. These groups can play a powerful role in delivering this strategy, so we want to work with them and support their efforts."

With this in mind, we suggest the objectives on p83 should be broader too, to recognise this important side of the third sector's transport-related activity. We recommend that they include the following:

- Under equality and health – "people have a greater sense of efficacy, ownership and improved wellbeing and social connections from engaging with and having a voice in transport"
- Under environmental impact – "communities are engaged with sustainable travel development, contributing to both infrastructure improvements and ownership towards the alternatives to driving, contributing to modal shift"
- Under economy and places – "local businesses and service providers work with transport providers to ensure local needs are met and visitor economies supported by sustainable travel"
- Under culture and language – "communities can discover and engage with local history, cultural and creative initiatives through community projects, information and art at stations or otherwise promoted through the transport network".

We support most of the priorities set out on p84, but advise that these too should be broadened to recognise the breadth of third sector involvement in transport. We especially recommend that the last two bullet points are significantly reworked to reflect how community rail and other third sector partners can play a vital role support and feed into work across this strategy – at present this is unclear. We recommend that these two points might be replaced with:

- "Support and nurture our growing network of community rail partnerships and station friends groups, so they can build positive relations and help communities get the most from their railways and stations, amplify local needs, and help rail to be integrated, inclusive and community-minded";

- “Work with third sector umbrella bodies, the transport industry and local authorities to ensure that community groups are treated as partners in sustainable transport development, with their voices and views heard, so they can access the support and collaboration they need, and so good practice can be shared across localities”.

Please also see our comments under Q4 above, which are relevant to strengthening the measures at the bottom of p84.

Aviation – We find it surprising and contradictory to see aviation being described as it is on p94, given commitments elsewhere in the strategy to create a sustainable and inclusive transport system. On reading this page, one would be forgiven for thinking that aviation aligns with this vision. Of course, one of the most effective ways we can decarbonise transport is by reducing air travel and shifting as many of these journeys as possible onto rail. We suggest this is clearly acknowledged, and a more robust approach is taken to this mini plan that irons out contradiction. The first objective on p99 reads like fluff, in contrast to the rest of the strategy: aviation being made “better” cannot be said to make communities healthier and more equal, quite the contrary. Under environmental objectives, we recommend that top of the list should be “air travel is reduced, with a shift towards rail and other sustainable alternatives”, and this list should also include “travel to and from airports is shifted onto public transport and private car use reduced”.

Q8: We have shown how transport will use the 5 ways of working set out in the Wellbeing of Future Generations (Wales) Act 2015. Do you agree with this approach?

Yes, but with improvements recommended below.

We strongly support the commitments to involvement and co-production outlined on p60, and highlight the role that community rail can continue to play in this, and we hope play more strongly as it continues to develop and grow with our support. However, this commitment currently isn’t reflected across all other parts of the strategy, so we refer back to our recommendations above for strengthening references to community engagement, locally-led change, and the third sector, elsewhere in the draft.

We also warmly welcome the focus on collaboration on p61. However, we propose that these commitments could be clearer and stronger, especially given the areas within transport where, in community rail’s experience, collaboration is not as it should be. For example, collaboration between operators, local authorities and the third sector on cross-border matters could be developed, such as where TfW rail services stop at stations with English-based community rail partnerships. As described above, of significant concern among many of our members attempting to promote modal integration is the lack of cooperation and alignment between bus and train operators.²⁹ Often, this leads to (sometimes sparse) local rail and bus services competing, rather than working together to provide the best possible sustainable journey options to local people and visitors. We recommend that strong emphasis should be placed in this strategy on collaboration between operators, across public transport modes, and with their local communities, if the aim of modal shift is to be achieved. This would also clearly tie together the first two ways of working, showing how collaboration supports local involvement and vice-versa, and underpinning the sentiments on integration and holistic thinking, which we welcome.

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?

Although we are not experts on road user charging, we agree with the principle of employing a range of methods to achieve modal shift away from private car use and onto public transport and active travel, and understand the range of major benefits that can be derived from this. We would emphasise again the great importance of engaging communities in change, and drawing on local views and knowledge to implement

²⁹ See our briefing on integration (appendix B)

change in ways that work for local people, while serving strategic goals. In our experience, when communities are engaged and empowered in sustainable transport development, it produces inclusive results that people buy into and can take advantage of, benefiting their health, wellbeing and prosperity.

There are also indications that when people come together locally in deliberation, such as to review different policy options or develop local projects, it can produce conclusions that are more progressive (in terms of sustainability) and inclusive than if people are simply 'consulted' individually, including openness to shifting away from mass car use. When the Leeds Climate Citizens' Jury came together, they concluded that private car use should become a 'last resort'.³⁰ This is admittedly a major city, but community rail projects, often in rural areas, also show how people coming together in all sorts of locations can help to coalesce people around the alternatives to driving, and produce needs-appropriate, place-based innovation and adaptation. It seems clear too, from the UK Climate Assembly, research by Transport Focus, and on-the-ground experience, that people are more open to measures to disincentivise driving, seeing these as fair, if these are accompanied by improvements and enhancements to the alternatives.³¹

Q10A: Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability effects for transport?

No.

We are unsure how to respond to this question as we cannot see a section or summary of 'sustainability effects' in the ISA report. We note that the Community Rail Development Strategy has been reviewed and noted, which we welcome, and we are pleased to see the recognition on p22 of the role of the third sector, especially in treating communities as partners.

Q10B: Are there any gaps?

We believe there are two significant omissions from the final ISA report:

- The strong evidence of the importance of community engagement and community-led change in supporting more sustainable forms of development and sustainable transport behaviours.³² We fed this into the ISA consultation and see our notes have been included in the table as 'noted' but this evidence has not been picked up and considered in the report itself, in terms of its importance to the strategy;
- Despite the Welsh Government's commitments to being globally responsible, sustainability impacts in other countries seem to have been ignored. The ISA report goes so far as to say the WTS *must* promote ULEVs, without referencing the environmental and social impacts that the production, import and disposal of these vehicles (and their batteries) will have, nor the fact that proactively pushing purchase of new cars means more cars in the world, presumably with cheap second-hand petrol and diesel cars flooding overseas markets.

Questions A & B: 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?

We cannot comment in detail on questions related to the Welsh language as this does not fall directly within our area of expertise. However, we would highlight that effective local engagement and

³⁰ See <https://www.leedsclimate.org.uk/leeds-citizens-jury-recommendations-published>

³¹ See Climate Assembly UK's final report, 2020, <https://www.climateassembly.uk/recommendations/index.html>, and Transport Focus's recent research on appetite for change, 2021, <https://www.transportfocus.org.uk/news/are-we-there-yet-helping-transport-users-to-make-sustainable-travel-choices/>

³² See our appended briefing on behavioural insights (appendix A)

community-driven change tends to mitigate risks around language and cultural heritage, since it helps to ensure that change is inclusive, needs-orientated, and respectful of local identities and heritage.

Questions C & D: Do you think this draft strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important? 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?

Similar to the above can be said about working with and benefiting groups with protected characteristics. Through positive, respectful and empowering engagement, these groups can be involved in transport development and have their voices heard, benefiting themselves greatly as a result in terms of levels of confidence, social interaction and mobility, and impacting positively on their wider communities. There are a growing number of community rail activities working with groups with protected characteristics, vulnerabilities or suffering marginalisation. These activities often succeed not only in benefiting these groups directly (such as by empowering them to feel confident using rail for the first time) but celebrating diversity within the wider community, promoting cohesion, and influencing the way our railways work and how inclusive they are. See these brilliant examples from the North of England: [Community Rail Lancashire's work engaging young people from the LGBTQ+ community](#); [work to make the Bentham Line dementia-friendly](#). We are increasingly sharing examples like these across our membership, and supporting their adaption in other areas. We would be pleased to work more closely with TfW and Welsh Government, and our third sector partners within Transform Cymru, to promote this good practice not just across the community rail movement, but across the transport field.

We can confirm we are happy for our response to be made publicly available.

For further information on community rail and our work in Wales, or queries on this response, see communityrail.org.uk, or contact info@communityrail.org.uk.

APPENDIX A & APPENDIX B

Please see separate briefings attached:

- A – Behavioural insights on sustainable travel
- B – Integrated sustainable transport briefing