

Wales Transport Strategy/Llwybr Newydd – Energy Saving Trust response

1. Do you agree with our long-term vision? (w/ Likert) and then 'Please provide your comments'

Agree

Energy Saving Trust is an independent organisation dedicated to promoting low carbon transport, energy efficiency, and sustainable energy use to address the climate emergency. Our work focuses on reaching net zero targets by encouraging reductions in energy consumption, the installation of new infrastructure and an acceleration to more sustainable, low carbon lifestyles.

We welcome the Welsh Government's broader definition of 'sustainable' laid out in Llwybr Newydd. We would suggest that an additional guiding principle could be that wherever possible additional co-benefits will be maximised e.g. around public health, job creation etc. We recognise that transport policy can be a vehicle for broader uplifts in people's quality of life and these opportunities should be capitalised on (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf).

2. Do you agree with our 20-year ambitions? (w/ Likert) and then 'Please provide your comments'

Good for people and communities; Good for the environment; Good for the economy and places in Wales; Good for culture and the Welsh language;

Agree,

We think that Llwybr Newydd could place the role of transport decarbonisation more centrally in these ambitions given its vital role in achieving success in other areas in the most meaningful way. We look forward to Llwybr Newydd developing further and the publication of the accompanying documents referred to in the consultation. The 'Decarbonisation Pathway' will be particularly relevant to the 20 year ambitions, being billed as a clear map and timetable for achieving emission and pollution reductions. We would welcome some more detail of what this document may include and when we can

expect it to be published. Likewise, we would welcome prompt publication of the Transport for Wales-led National Transport Delivery Plan to enable us to understand the Welsh Government's intentions in greater detail. We are pleased to see the detail laid out in the recently published EV Charging Strategy and will be supplying a response to that document separately.

We welcome the Welsh Government's recognition of transport as a social issue and that a lack of access to services can compound existing vulnerabilities. The issue of transport poverty is implied throughout Llwybr Newydd, we would welcome this issue being explicitly and officially recognised in both the 5-year priorities and 20-year ambitions and referred to where relevant in the mini plans (e.g. Community Transport). Energy Saving Trust is part of a project, the "Fuel and Transport Poverty in the UK's Energy Transition" (FAIR) programme, led by the University of Sussex as part of the Centre for Research into Energy Demand Solutions (CREDS). This work has highlighted that many of the most vulnerable members of our society face both transport and fuel poverty. For this reason we were pleased to see the linkages between transport and fuel poverty mentioned on page 83 of Llwybr Newydd where it states that by 2040 Wales will have 'Delivered benefits to the economy and places in Wales because [...] there is less fuel poverty in rural areas where the cost of running a car is high'. We believe that these linkages should be expanded upon and made more explicit given the vulnerability of our rural communities to both transport and fuel poverty. Officially recognising that those who are unable to access adequate transport services, either due to cost barriers or inadequate service provision, are experiencing transport poverty would be a welcome addition to Llwybr Newydd.

We are pleased to see the Welsh Government's focus on active travel and the integration of different transport modes, along with enhanced provision for active and public transport as part of new developments and services. Likewise, we were pleased to see the repeated references to educational programmes to promote active travel given that the transport hierarchy underpins our transport advice and project delivery. To ensure the benefits of new and improved infrastructure are realised, numerous projects have demonstrated that it is vital to invest in community and workplace engagement and training to shift habits, grow awareness of local routes, and build confidence in active travel options. Through the Energy Saving Trust-delivered Local Government Support Programme local authorities in England can be assisted with the creation of sustainable travel plans for their staff. Alongside these educational or knowledge-based approaches the eBike Loans and Fix Your Bike scheme that Energy Saving Trust administers on behalf of the Scottish Government and UK Department for Transport act as financial enablers to overcome barriers to active travel. These schemes have proven popular. The eBike Loan has to-date this year (2020/21) seen 1,116 applications and its budget increased by £1m due to high demand. The loan has enabled a significant number of people who otherwise would not have been able to purchase an ebike to benefit from this technology with 61% of respondents to our evaluation saying that they would not have been able to afford their ebike otherwise. To increase the uptake of active travel Welsh Government could offer its own enhanced Cycle to Work scheme with greater discounts alongside the provision of

advice and a low interest loan scheme to increase access to the full suite of active travel options.

On advice and education more generally, just as for other societal changes that must be made on the path to net zero, public engagement and 'buy-in' is vital if we are to effectively decarbonise the transport sector in Wales. As a first step, Welsh Government could broaden its pre-existing home energy and local authority advice service to include advice on active travel options, EVs and chargepoints. This is an approach already underway in Scotland through the Home Energy Scotland advice service (<https://www.homeenergyscotland.org/make-greener-choices-at-home-on-the-go/>). Home Energy Scotland is a world-leading service and with the relatively recent addition of sustainable transport advice alongside the well-established home energy focus, callers can now get more holistic energy saving advice. HES advisors are able to direct clients to support services such as the Transport for Scotland new and used Electric Vehicle Loans (<https://energysavingtrust.org.uk/grants-and-loans/electric-vehicle-loan/>). 91% of callers who contacted HES to speak about transport found the advice useful with 69% feeling that the advice provided had helped in making decisions about how to travel more sustainably. When asked whether the advice had influenced them to take transport related actions 10% of callers who got in touch to speak about transport had been influenced to purchase an EV while 22% had been influenced to purchase an ebike.

3. A. Do you agree with our 5-year priorities? (w/ Likert) and then 'Please provide your comments'

Agree,

In general, we think that the priority areas are excellent but will require immediate action to achieve significant results in the current 5-year period. In parallel, care should be taken to try, as far as possible, to avoid unforeseen negative impacts resulting from near-term policy choices. For example, incentives for modal shift and parallel disincentives for high carbon transport, while critical near-term priorities, need to be well considered and deployed with care. See our response to question 9 for further details on these issues.

Our view is that to capitalise on the growing interest in electric vehicles a priority area in the next five years must be the creation of effective incentives for electric vehicle uptake, whether through loans, scrappage schemes, grants, EV car clubs or other mechanisms. Electric mobility must sit alongside mileage reduction, public transport, and active travel to meet the needs of all communities and businesses. Accompanying this must be a programme of EV chargepoint installations across Wales. On this point, we welcome the ambition shown in the ongoing EV Charging Strategy. There are a number of programmes in operation across the UK that Wales could draw on when undertaking this work. For example, Energy Saving Trust manages the On-street Residential Chargepoint Scheme for

the UK Government, the Local Government Support Programme in England (which provides advice to councils on EV strategies) and Switched on Towns and Cities in Scotland (which offers feasibility studies for local authorities on EV infrastructure).

Broadly, we strongly welcome the prioritisation of the transport hierarchy and the recognition that effectively tackling transport challenges will require collaboration across and outside government. COVID-19 has forced many of us to spend more time closer to home and to rethink the significance of our communities. Bringing services closer to people's homes can reduce the number of trips taken by car – tackling emissions, encouraging active travel and strengthening local communities and economies. For all of these reasons, it is good to see the prioritisation in Llwybr Newydd of planning for more remote and home working with developments closer to people's homes, adhering to 15/20 minute city principles.

When undertaking necessary maintenance and improvement works to transport hubs and public buildings, it should be a priority to improve links between low-carbon transport modes so that people can more seamlessly move from walking to buses to the train service. New housing or service developments should be easily accessible by public transport and active travel options, with new shared 'work hubs' created to service smaller towns.

As part of Priority 4 we suggest that the provision of education and training around low carbon transport at workplaces and for fleet managers be a priority as these are cost effective approaches which can be readily deployed so that rapid progress can be made in addressing the first set of 5-year priorities. We would also expect to see a commitment to EV awareness raising and an equitable EV transition more broadly. To achieve this we need a strong second hand EV market, access to on-street charging in rural and less affluent areas (which will also address elements of Priority 3), vehicle purchase support, EV community engagement and familiarisation. EVs are briefly touched on in the Priority 4 introduction but do not feature in the more detailed "we will" statements in Priority 4.

- 3. B. 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.**

We agree with these more refined priorities. They more concisely address the need to reduce personal vehicle use, shift travel modes to low carbon alternatives (active travel,

shared and public transport and EVs), and focus on addressing climate change. What must not be lost however is the focus on adaptability in transport systems and planning for greater connectivity. These priorities must also be backed up with ambitious, well-considered and adequately funded policy and delivery projects, that addresses each of these priority areas.

4. We have identified high level measures to aid us to capture our overall progress. Are these the right measures? (Y/N) Can you suggest others?

Yes,

We strongly support the plan to develop a National Transport Survey which will better capture regional disparities in transport as well as crucial demographic information.

We suggest that the following measures could also be applied to give a more in-depth assessment of the progress made:

- Public intention to use public transport and/or active travel options
- Public intention to lease or buy an EV; use an EV car club
- Self-reported barriers to modal shift.
- Energy consumption from the transport sector
- Energy consumed by EVs vs. Internal Combustion Engine vehicles
- Typical transport costs per year per person
- A target for reducing overall car miles by a given percentage. The latest Scottish Climate Change Plan update commits to reducing car kilometres by 20% by 2030 with a detailed route map for how this is to be achieved due to be published early this year. A similar approach could prove effective here in Wales though care would have to be taken to account for the fact that typical car miles will differ depending on rurality and access to services.

5. Do you think we should include specific targets for more people to travel by sustainable transport? (Y/N) Do you have suggestions for how we should do this?

Yes,

A target for 50% of journeys to be made by sustainable transport (active travel or public transport) by 2030 is an ambitious but achievable target. This likely represents a doubling from current levels though reliable data on the number of trips made by different travel modes has not been collected recently, with the most up-to-date figures seeming to be from 2012 (<https://gov.wales/sites/default/files/statistics-and-research/2019-01/personal->

[travel-2012.pdf](#)). This data should be collected more regularly (e.g. annually) with a greater breakdown of travel modes used. Given that the majority of personal journeys in Wales are relatively short – 8 miles on average – there is considerable scope to increase the proportion of journeys taken using sustainable transport options.

6. We have identified a set of actions to deliver the draft strategy. Are they the right actions? (Y/N) Are there others that you can suggest

Yes,

Giving priority to the transport hierarchy and serving rural and disconnected communities is welcome. Sustainable investment in the short term will involve soft approaches which have proven themselves to be cost effective such as fleet support (advice and fleet reviews, business plan creation, 'try before you buy', low interest loans etc.), workplace education programmes and EV and ebike support. These programmes can be rapidly implemented alongside longer term infrastructure investments and the creation of incentive/disincentive schemes. The financial support schemes Energy Saving Trust delivers on behalf of Transport for Scotland have proven effective at encouraging the take up of low carbon transport modes with 91% of respondents to a survey on the EV Loan reporting that the loan had an impact on their decision to purchase an EV, and 41% saying that they would not have been able to purchase their EV without the loan. The scheme has understandably proven popular with almost 1,500 applications to-date this year (2020/21) and the scheme having consistently grown year on year to meet the demand. The Welsh Government could consider adopting a similar approach.

As part of the enhanced asset management strategy, Transport for Wales and the Welsh Government should schedule additional works (e.g. creating bike lanes, laying underground cabling for chargepoints, creating bus-rail transport hubs etc.) to coincide wherever possible with regular maintenance work.

Stakeholders and consumers will soon need to see greater detail on what Llwybr Newydd will mean in practice with more detailed plans and funding commitments. A plan for measuring progress against the 5-year priorities in particular would be beneficial as would a public engagement strategy to gain a greater understanding of the public's transport needs.

7. We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these? (Y/N) Do you have any comments on these?

On the whole yes, although we raise some areas for consideration our response below.

On active travel we would argue that ebikes and ecargo bikes should be considered more centrally. They enable first and final mile carbon reductions and open up cycling, for both personal and business use, to people who might not otherwise be able to use this mode of transport. They are also able to make longer journeys more accessible through active travel while being able to replace van use in urban areas for businesses. Given that the average personal journey in Wales is 8 miles, ebikes could play a significant role in reducing the number of journeys taken by car. Energy Saving Trust delivers several ebike and e-cargo bike schemes on behalf of the Scottish Government and the UK Department for Transport. The eBike Grant Fund, now in its fourth funding round, assists Scottish local authorities, public sector agencies, further and higher education institutions, active travel hubs and community groups to adopt ebikes, etrikes, ecargo bikes, cargo bikes and trailers, tandems, adaptive bikes and trikes with funding levels determined by the projected size of investment. For Scottish households, Energy Saving Trust administers a zero interest eBike Loan scheme which can loan a maximum of £6,000 per household with a 4-year repayment period to cover the cost of ebikes and e-cargo bikes. These schemes have proven highly popular with households and businesses with the schemes often over-subscribed. Our evaluation data suggests that these grants and loans are effectively targeting segments of the market that might not otherwise engage with active travel, 47% of respondents to our survey on the loan scheme said that they would struggle to cycle a non-ebike, the same percentage who said that they had wanted an alternative to a car, while 76% of respondents said their motivation for purchasing an ebike was for exercise. A similar approach could prove beneficial here in Wales, particularly for people commuting into our urban centres and businesses undertaking last mile deliveries.

We feel that currently, investment in EVs and the rollout of charging infrastructure falls between the gaps of these workplans. It will be crucial that this area of investment is prioritised (see: question 12 response) and we plan to expand further on the importance of this sector in our response to the EV Charging Strategy.

On public transport, we wish to restate our view that it is a priority to link up different transport modes (including community transport). This will allow active travel to be combined with effective bus and rail services in a simple and cost effective way so that sustainable travel becomes the natural choice for all kinds of journey across Wales.

The third sector, community transport, is extremely important in some areas and for particular groups of people, filling gaps in provision left by private sector bus services. We recognise and agree with the desire to see this crucial sector continuing and thriving but believe that support from Welsh Government should go further than driver training and Memorandums of Understanding. The sector is run with a low level of resourcing with the majority of drivers being volunteers. If this sector is expected to continue plugging the gaps in provision left by private sector operators and offering a lifeline to vulnerable groups in Wales, this should be accompanied by adequate funding. Welsh Government could help to ensure consistent support for community transport across local authorities, including multi-year funding agreements to provide a foundation on which organisations

can develop and grow. Alongside this, Welsh Government should seek to professionalise the sector with a unified and recognisable brand across Wales.

With additional support, the third sector could go further than the 'greater use of alternative vehicle technologies by 2040' ambition set out in Llwybr Newydd. By 2040 virtually all vehicles will need to be using zero carbon fuels and ride sharing will be much more prominent. Anecdotally we have heard through our networks that many community transport organisations are eager to transition to EVs with some even putting money aside to this end. Unfortunately, many of these groups have had to dip into these funds to cover the loss of income resulting from the Covid crisis. With the right support community transport could be a leader in the uptake of battery electric vehicles and other low carbon alternatives, normalising the use of these technologies in rural areas and spreading them further across Wales. EV car sharing clubs led by third sector organisations have encouraged community members to invest in their own EVs and have helped to overcome the familiarity barrier to EV uptake (see: www.arloesigwyneddwledig.cymru/en/prosiectau/ceir-cymunedol-trydanol/). In Scotland, housing associations can access EVs through the Energy Saving Trust-administered Switched on Households programme, allowing them to provide low carbon transport options to their tenants. A Community Clean Vehicle Fund could be set up to help third sector organisations meet the cost of switching to low carbon vehicles.

We welcome the focus on freight and logistics in Llwybr Newydd and think a move towards a greater share of freight being carried by rail is a worthwhile consideration. To assist the sector in decarbonising, the Welsh Government should promote greater fleet support to assist fleet managers in the adoption of ecargo bikes for final mile deliveries, and the adoption of electric powered cars and vans. In the future, Welsh Government should broaden this fleet support provision as alternatives for large road-based fleet vehicles become viable, whether through electrification or hydrogen. Some public sector bodies are already making use of the in-depth, data-led fleet support Energy Saving Trust offers to the public and private sector for freight and HGVs, but this could be scaled up.

Fleets and businesses are a major purchaser of new vehicles across the UK, accounting for over 50% of car registrations in 2020 and playing a significant role in the rapid rise in new EV registrations we have seen over the past year (<https://www.smmmt.co.uk/vehicle-data/>). The lower running and maintenance costs of EVs can make them an excellent financial choice for many organisations. Fleet EVs increase the visibility of EVs among employees and the public. Due to the higher turnover of fleet vehicles, fleet sales drive the second-hand market, improving the affordability of EVs for private buyers. Through our experience delivering extensive fleet support programmes over several decades (<https://energysavingtrust.org.uk/service/fleet-support/>) we've seen how investing in closer engagement with Welsh fleet managers can deliver results quickly. The Welsh Government should prioritise the delivery of tailored, impartial advice for fleet managers to give them the confidence they need to make new business cases and ultimately make the switch to electric.

8. 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? (Y/N) Do you have any comments?

Yes we agree with this approach, no further comment

9. 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?

We support the creation of Road Charging and Clean Air Zones as an effective means of tackling local air pollution and national climate targets as well as reducing congestion in our communities.

When considering charges for road use, the Welsh Government will need to consider distributional impacts and consider how it could mitigate any disproportionate impact for people on low incomes, or in vulnerable circumstances.

There is strong evidence to suggest that Low Emission/Clean Air Zones and other Urban Access Regulations are effective at reducing local pollution and emissions. Repeated studies have shown that the poorest and most vulnerable in our societies are disproportionately affected by air pollution (<https://www.sciencedirect.com/science/article/pii/S1361920919300392>), recent research also suggests that air pollution has twice the impact on lung function for lower-income households (<https://airqualitynews.com/2019/07/09/air-pollution-has-twice-the-impact-on-lung-function-for-lower-income-households/>). Additionally, recent polling suggests that, contrary to popular belief, a majority of the public (72.6% of the British public in overall support) are in favour of Low Emission/Clean Air Zones in principle (www.transportenvironment.org/sites/te/files/publications/City%20bans%20are%20spreading%20in%20Europe_Report.PDF). For these schemes to succeed and continue to have popular support they must be well designed and operated.

Considerations

Recently published analysis

(www.sciencedirect.com/science/article/pii/S2590332220300464#bib8) which considers the fairness of the London LEZ highlighted that its success is something of an outlier, with many LEZs failing to get off the ground and the success of the London LEZ owing as much to a combination of demographic factors specific to London than to the scheme itself. For example, incomes are relatively high in London, car use was already low, and the city had well developed public transport alternatives. The fact that many residents who lived within the LEZ were exempt or were offered significant discounts aided public acceptance.

Research undertaken ahead of Scotland's decision to implement LEZs (which have now been delayed until later this year) mapped the potential vulnerability of households or communities to a Low Emission Zone in Edinburgh (<http://eprints.whiterose.ac.uk/134945/>). This identified that any negative LEZ impacts would be comprised of three components: exposure (how much non-compliant traffic there is into the zone at individual and regional level), sensitivity (ability of a household to pay for a LEZ-compliant vehicle measured by Median Household Income), and adaptive capacity (ability to shift travel mode measured by proximity to public transport, and proximity to LEZ and disability level).

When considering how best to deploy road charging to maximise benefit and fairness, Welsh Government should build on this assessment with richer and more nuanced data sources such as deprivation indices and the use of median disposable income instead of median household income and a richer metric of public transport provision quality.

Given that Wales has higher than average levels of poverty and car dependence as well as higher than average levels of disability and a greater share of low income households living in rural and semi-rural locations than the GB average, the introduction of road charging should be thoughtfully considered so that as far as possible vulnerable groups, those on low incomes, and those who are reliant on personal vehicle use aren't unfairly penalised.

Possible solutions

The potential negative impacts of road charging schemes can be mitigated in a number of ways, and there are good examples to draw inspiration from across Europe (see: urbanaccessregulations.eu/userhome/map). Earlier LEZs (such as London's) opted for exemptions to the road charge for residents or particular groups such as those on low incomes, shift workers etc. While these approaches can be effective at mitigating costs for specific groups and are the least administratively taxing option, this system of exemptions can create significant loopholes and poor coverage, which have hampered the success of LEZs in Italy. At a more fundamental level, a list of exemptions will limit the number of high emitting vehicles that are taken off the road, minimising the benefit of the road charge and slowing progress towards pollution and emission targets. A better approach, though one requiring more consideration, is to offer incentives as well as penalties. The disincentive of the road charge should be coupled with incentives that align with Welsh Government ambitions. For example, Energy Saving Trust administers a number of funds on behalf of the Scottish Government which are designed to cushion the impact of the proposed LEZs there and transition households and businesses to low carbon alternatives.

The Low Emission Zone Support Fund (energysavingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund/) offers an incentive, in the form of a scrappage scheme, for low-income households, businesses with nine or fewer full-time employees and sole traders to take older, more polluting vehicles off the road. Low income households are eligible for £2000 while small businesses and sole traders are eligible for £2500. To

encourage modal shift towards active travel, car sharing, and public transport, households are also eligible for additional 'Travel Better' funding of £500 per adult up to £1000 to go towards these transport modes (new bikes, bike repairs, public transport season tickets etc.).

A separate fund, the Low Emission Zone Retrofit Fund (energysavingtrust.org.uk/grants-and-loans/low-emission-zone-retrofit-fund/) provides micro businesses, who operate within one of Scotland's four proposed low emission zones, with support to retrofit their existing non-compliant vehicles with Clean Vehicle Retrofit Accreditation Scheme (CVRAS)-approved solutions that meet the minimum proposed standards of the low emission zones (<https://www.lowcvp.org.uk/projects/joint-working-projects/clean-vehicle-retrofit-accreditation-scheme.htm>). The CVRAS register filters which approved companies and emission reduction systems suit particular vehicles best, based on make, model and engine type. The tool contains details of companies and their systems approved under the scheme requirements, along with their contact information and the categories of vehicle to which their systems can be applied in order to make the vehicle CAZ compliant. Grants are available to cover up to 80% of the cost of a retrofit solution up to maximums of:

- £5,000 for light commercial vehicles;
- £10,000 for taxis,
- £15,000 for HGVs and refuse collection vehicles

Not only do these financial incentives encourage people to make positive changes, but when targeted appropriately through promotion, messaging and eligibility criteria, they can help support those most likely to be negatively affected. What is clear when considering the level of grant funding available above is that this alone will not enable a family or small business to buy an electric vehicle. Complementary low or zero-interest loans could also be made available for this purpose.

However, road charging should not just be about newer/cleaner personal vehicles, road charging should ultimately encourage fewer vehicles. Even if every fossil fuel-powered vehicle was replaced with an EV tomorrow, small particulate matter from degrading car tyres as well as congestion would continue to be issues, despite impressive improvements in air quality. We welcome the recognition of this within Llwybr Newydd. The priority must be to encourage people to choose active travel or public transport, where appropriate. Other European cities have trialled a range of approaches that we could draw on in Wales. For example, the Brussels region offers free public transport and access to car sharing for residents scrapping their cars, while Madrid gives an 'access guarantee' so that those not covered by LEZ exemptions can use public transport to come to the centre. Central to the success of this disincentive/incentive relationship will be accessibility – we must see greater investment in interconnected active travel, public transport, and third sector transport networks with low-income or peri-urban and rural areas not left behind.

Finally, behaviour change programmes and messaging to encourage people to follow the sustainable travel hierarchy will also be important and workplace programmes such as an enhanced cycle to work scheme combined with education could prove very effective. Funding these schemes through the revenue generated by the road charge would be likely to increase public acceptability and buy-in.

Questions on the Integrated Sustainability Appraisal

10. A. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability effects for transport?

Yes,

10. B. Are there any gaps?

No

10. C. Do you have any comments on the findings of the report?

We believe that the ISA has done a good job of covering most relevant issues and rightly recognises that Llwybr Newydd has the potential to be a highly significant document in terms of transport decarbonisation and more equitable transport provision across Wales.

The ISA raises some concerns around how much of an impact Llwybr Newydd will have on rural car use with this being part of the reason for an overall mixed impact on decarbonisation. We recognise that Llwybr Newydd is a high level document, setting out ambitions and priorities for the next two decades, and so the level of detail required to determine the ultimate impacts on rural car use into the future is perhaps not possible. We stress that some of this detail will have to be presented relatively quickly to achieve the 5-year priorities. When dedicated policy papers are published in the near future they should aim to take full account of the challenge of rural transport decarbonisation. The likelihood is that for many people living in rural Wales, a reliance on personal, shared, or community vehicles will continue, with these having to be electric (or powered by another low carbon fuel, such as hydrogen produced from renewable electricity). The provision of supporting infrastructure will therefore be essential, with a significant risk of a market failure in rural chargepoint provision otherwise. Therefore, we welcome the publication of the EV Charging Strategy, the Welsh Government must take steps to ensure that the rollout of infrastructure meets the needs of Welsh rural communities.

11. The usual questions about the effect on the Welsh language and protected communities etc.

Energy Saving Trust does not take a view on how the proposals of Llwybr Newydd could be formulated to have positive or increased positive effects or impacts on the Welsh language/protected communities. However, we agree that it is essential that all Welsh Government policy considers the impacts on the Welsh language/ the protected communities of Wales.

12. Are there any further comments that you would like to make on Llwybr Newydd: a new Wales transport strategy?

We think that a greater focus on the role and rollout of EVs should be present throughout Llwybr Newydd. By 2030, all new vehicles must be electric or hydrogen, which demands major changes in awareness, infrastructure, availability, and travel habits. Given Wales' rurality and reliance on personal vehicles EVs will likely play a greater role in decarbonising transport here than other regions of the UK. This should be recognised to a greater extent in the ambitions, priorities, and plans laid out Llwybr Newydd.

We would also welcome a more explicit recognition of the issue of transport poverty and how this relates to, and compounds, other forms of poverty in Wales – such as fuel poverty. Though transport poverty as a concept is implied in certain passages of the draft Strategy its importance should be recognised to a greater extent. For many of the same reasons EVs look set to play a disproportionate role in decarbonisation in Wales, transport poverty is a particular risk, creating poorer outcomes for many of our most vulnerable citizens.