

Dear Sir / Madam,

Evidence:

Summary of Recommendations:

1. We welcome the commitment on the part of the Welsh Government in setting a quantifiable target for remote working, however we feel that it is not sufficiently ambitious to address the climate and biodiversity emergency, and to improve the quality of our natural and built environments. We recommend that the target should be expressed as “at least” 30%.
2. A fundamental review of all new highway schemes where physical works have not commenced should be undertaken, with a view to assessing the degree to which such new schemes would compromise the target
3. In order to achieve the quantifiable target, the Welsh Government should deploy all the public policy tools which are at its disposal, including the town and country planning system, transport policy, budgetary arrangements and research and development.
4. WelTAG, the Welsh Government transport appraisal tool should be reviewed in the light of the target.
5. The Welsh Government should include the remote working target in its ongoing review of the Wales Transport Strategy, and subsequent National Transport Delivery Plan, in order to strengthen the presumption against new highway construction.
6. No new highway scheme, especially for example the Red Route in Flintshire, should be included in the forthcoming National Transport Delivery Plan unless it is fully compliant with a new post-Covid WelTAG and an adopted, post-Covid Wales Transport Strategy.
7. The North Wales Metro should be the subject of a comprehensive re-write. It should amongst other things exclude the Red Route, in pursuit of the remote working target.
8. A thorough review of rail services on a Wales-wide basis from the point of view of commuters should be carried out.



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## 1. Introduction to the Red Route:

1.1 The “Red Route” is a proposed 13 kilometre dual carriage way in Flintshire. It is by far the largest, most expensive and most damaging proposed highway scheme in Wales. It would cut through ancient woodland, old hedgerows and wildflower-rich meadows. It would exacerbate congestion in nearby villages, and results in an increase in carbon emissions from car- borne transport.

1.2 We consider that it is fundamentally at odds with the Senedd’s aspirations in terms of the 30% remote working target set out in the consultation document, and in terms of combating climate change in pursuit of its declared climate and biodiversity emergencies.

1.3 Costs of the scheme are spiralling out of control, with the scheme being costed at £250m in £210 million in 2016, to £242 million in 2017 and to over £300 million in 2019.

## 2. Background:

2.1 The advent of the COVID-19 pandemic in Wales coincided with a dramatically increased profile for climate change, both within the Senedd and in the wider world of Wales, leading to the declaration of a climate and biodiversity emergency. The rapid and fundamental enforced changes in behaviour patterns due to the pandemic were traumatic for many, but paradoxically, they also increased awareness of the value of the natural world to our physical and mental well-being. The return of marine mammals such as dolphins and porpoises to busy harbours and shipping lanes, and a widespread perception of hitherto unnoticed birdsong in our towns and cities for example led many of us to reassess our attitude to the natural world.

2.2 The Senedd is to be praised for proactively grasping the opportunity to "build back greener" i.e. to take stock of where we are as a nation and to avoid the assumption that a complete return to the pre-COVID Wales in every respect is neither desirable nor feasible.

2.3 This conclusion is borne out by a recent journal article Felstead, A and Reuschke, D (2020) ‘**Homeworking in the UK: before and during the 2020 lockdown**’, WISERD Report, Cardiff: Wales Institute of Social and Economic Research :-

<https://wiserd.ac.uk/publications/homeworking-uk-and-during-2020-lockdown>

2.4 The report found, *inter alia* :-

- in June 2020, 36.5% of the working population were working from home.
- 88.2% of employees who worked from home wanted to continue to do so in some capacity.
- 50% wanted to work at home often or even always, after COVID-19 restrictions are lifted, permitting a return to “normal” working conditions.



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2.4.1 The report concluded :-

*“In general, then, the results suggest many workers have got used to – and may even have experienced the benefits of – working at home after a shaky start. In addition, productivity has not been adversely affected by the shift towards homeworking. Furthermore, if those who want to continue working at home in the future are allowed to do so, productivity may be boosted by a sustained increase in the prevalence of homeworking as the strongest performers are those who are keenest to continue to work at home”*

### 3. Feasibility of the 30% Target:

3.1 An examination of Welsh Government statistics on the breakdown of employment types in Wales shows that, even now, 30% of all employment could be carried out remotely. This percentage will rise in the future due in part to structural economic changes such as the forthcoming increase in automation for example.

### 3.2 We therefore welcome this Inquiry, and are grateful for the opportunity to participate in it.

We would further be most grateful for the opportunity to provide oral evidence to the committee in due course.

### 4. The Benefits to the Environment of Remote Working:

4.1 The Welsh Government and the Senedd fully recognise the benefits of remote working to the Welsh and global environments in terms of combatting climate change. We fully endorse this recognition, and there is no need to repeat the benefits from the point of view of climate change here.

### 5. New Highway Infrastructure:

5.1 Working towards attaining or exceeding the Welsh Government’s remote working target would obviate the need for substantial new highway infrastructure. New highway infrastructure, especially new highway construction is of course extremely damaging from the point of view of the biodiversity of Wales.

5.2 Very significant, permanent and irreversible adverse impacts arising from new highway infrastructure include for example :-

5.2.1 Physical destruction of habitats and species by the footprint of new highways and associated infrastructure.

5.2.3. The destruction of ecological resilience through the severing of habitats and species population connectivity.

5.2.4. A myriad of indirect adverse impacts such as noise, dust and other air quality issues, hydrological damage, water quality, lighting, and collisions etc.



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5.2.5 The opening up of large swathes of environmentally-sensitive land for additional damaging development due to such land being severed from the open countryside, rendering it vulnerable to destruction through being what planners refer to as "white land".

#### 6. The Welsh Government Target of at least 30% of Workers carrying out Remote Working:

6.1 We welcome the commitment on the part of the Welsh Government in setting a quantifiable target for remote working, however we feel that the target should be reframed as "at least" 30%, in order to reflect the urgency of the climate situation.

#### 7. Induced Traffic:

7.1 The concept of induced traffic, whereby new highway capacity stimulates extra car-borne trips which would not have been hitherto feasible without such additional capacity, thus drastically reducing or cancelling out any intended increased capacity, is a universally acknowledged and accepted phenomenon. Thus the construction of new highways is diametrically opposed to attaining the Welsh Government target, and would frustrate the intention to attain it.

#### 8. How to Attain the Target:

##### 8.1 A Review of Public Policy Tools:

8.1.1 Notwithstanding the above, we consider that in order to attain the quantifiable target, the Welsh Government should deploy all the public policy tools which are at its disposal, including the town and country planning system, transport policy, budgetary arrangements and research and development. A thorough and methodical review of all of these tools is required.

##### 8.2 A Review of all New Highway Construction Schemes in the Light of the Target:

8.2.1 A fundamental review of all new highway schemes where physical works have not commenced should be undertaken, with a view to assessing the degree to which such new schemes would compromise the target. All schemes which would have a material adverse impact on attainment of the target should be replaced with a comprehensive package of non-highway construction measures, building on the successful precedent of the Burns Commission Report into the M4 Relief Road. No budgetary provision should be made for such new highway schemes, with the financial resources thus freed up to be devoted to such non-highway construction measures.

##### 8.2.3 WelTAG:

8.2.4 WelTAG, the Welsh Government transport appraisal tool should be reviewed in the light of the targets. Whilst it is accepted that it has relatively recently been reviewed, with the assistance of the Office of the Sustainable Development Commissioner, that review predated the COVID-19 pandemic, and the Senedd's commitment to "build back better and greener", therefore a review, which would assign greater weight to non-highway construction modes should be undertaken.



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8.2.5 The Wales Transport Strategy (Y Llwybr Newydd) and the National Transport Delivery Plan:

8.2.6 The Welsh Government should include the remote working target in its ongoing review of the Wales Transport Strategy, and subsequent National Transport Delivery Plan (see below), in order to strengthen the presumption against new highway construction.

8.2.7 All proposed highway schemes, at whatever stage they are in the consent process, should be considered under the auspices of the Wales Transport strategy, including especially the Red Route in Flintshire.

8.2.8 The National Transport Delivery Plan:

8.2.9 No new highway scheme, especially the Red Route in Flintshire, should be included in the forthcoming National Transport Delivery Plan unless it is fully compliant with a new post-Covid WelTAG (see above) and an adopted, post-Covid Wales Transport Strategy.

8.2.10 The North Wales Metro:

8.2.11 We are strongly supportive of the Metro concept defined as it is as a very high quality, high frequency seamless public transport/active travel comprehensive package of measures aimed at bringing about a fundamental modal shift away from the private car. However, we consider that the North Wales Metro is a travesty of the Metro concept, including as it does a highway scheme which is, by a considerable margin, Wales' largest. Indeed, the Transport Minister Mr Ken Skates went so far as to state at the recent Senedd Petitions Committee meeting to which he was summoned, that the North Wales Metro is wholly dependent upon the delivery of the Red Route, thus displaying a fundamental misunderstanding of the Metro concept

8.2.12 We therefore consider that, for this and other reasons, the North Wales Metro should be the subject of a comprehensive re-write, excluding the Red Route, in pursuit of inter alia the remote working target.

8.2.12 A Review of Welsh Rail Services from the Point of View of Commuters:

We consider that, in order to attain the 30% target, rail commuting on a Wales-wide basis should be the subject of a thorough review. The recent (pre COVID19 ) cuts to commuter time rail services on the North Wales coast for example are counter- productive, and only serve to frustrate the attainment of the target. Acknowledged spatial inconsistencies on a Wales-wide basis indicates the need for a Wales-wide review.

9. The Relationship between all Traffic and Commuter Traffic:

9.1 Whilst proponents of new highway schemes may attempt to construct an argument to the effect that not all road traffic is commuter traffic, and that new highway construction is therefore not incompatible with the attainment of the remote working target, Welsh Government statistics show that approximately 27% of all car-borne traffic is commuter traffic.



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9.2 Thus cancelling the Red Route scheme and replacing it with sustainable solutions would constitute a very considerable contribution to attaining the remote working target.

9.3 I would be grateful if you could keep me informed of developments in relation to this matter. Please acknowledge receipt via email. NWWT reserves the right to make further representations in respect of this matter.

Yours faithfully,



**Adrian Lloyd Jones** | Living Landscapes Manager | Rheolwr Tirluniau Byw

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