



By email.

12th November 2019.

Dear Janet,

Thank you for your letter dated 16 October 2019 in relation to the Petition P-05-886 to Stop the Red Route (A55/A494 corridor).

I have received several letters from members of the public in the last two years and I have tried to help them use the Well-being of Future Generations Act directly in conversations with public bodies by referring them to:

- My report, [Transport fit for future generations](#);
- My frameworks that provide prompts for carrying out sustainable development; and
- The relevant well-being objectives and steps of the Welsh Government and the Flintshire Public Service Boards.

I would like to begin by clarifying that the Well-being of Future Generations Act does not give me the ability or the resources to intervene in specific decisions. However I have identified both transport and decarbonisation as being key areas of focus for my office and the work I have undertaken to date in this area has wide applicability to transport decisions being taken across Wales

Considering the case that has been made around significant road building schemes I was concerned that the previous Welsh Transport Appraisal Guidance was not aligned with the requirements of the Well-being of Future Generations Act. I, therefore, provided advice to and worked directly with the Welsh Government to amend this guidance, which has now been published as [WelTAG 2017](#). Unfortunately, since the launch of the new guidance, we have received a number of letters about different road proposals where people feel that WelTAG and the Act were not fully considered or the consideration they were given was only a formality and retro-fitted to a pre-determined solution.

As a follow up on my work with the Welsh Government in the rewriting of WelTAG, I have chosen a few examples to verify implementation. While this scheme was not one of the examples I have looked at, my conclusions should be equally relevant to the Red Route (A55/A494 corridor) proposal. My findings from the schemes that I did look at are that I need to see more elements and much clearer evidence of how projects:

- apply of the five ways of working to consideration of possible solutions to ensure the needs of future generations are considered;
- maximise contribution to the well-being goals;
- evidence that Transport is the best solution;
- align project objectives and options to the relevant well-being objectives and steps;
- re-assurance at Stage 1 that the project will not damage any of the objectives or goals;
- clear statement that the work done at Stage 1 enables the Public Body to be sure that they will not compromise the ability of future generations to meet their needs

I have said the building of new roads is a solution of the past that often creates more traffic and pollution in the long-term and that the current approach to transport is no longer fit for our future generations. We need a modal shift towards more sustainable alternative if we want to achieve the national well-being goals, as well as the carbon reduction targets set out in [A Low Carbon Wales](#) and the Committee on Climate Change's [Net Zero](#) report.

This issue is particularly relevant in Wales where emissions from transport have increased rather than reduced in recent years. This has happened in a context in which the average CO2 emissions per km travelled by new vehicles has been reducing by around 3% per year. The reason for the net rise in emissions is that the total number of kilometers travelled by all motor vehicles in Wales reached a record high in 2018, and rose 9% over the 2012-2017 period. Wales has the lowest rate of uptake of ultra-low emissions vehicles in the UK, at 0.2% against an average of 0.5%.¹ Given these issues the surface transport sector should be a key focus area for the WG in its drive towards rapid decarbonisation.

My report, [Transport fit for future generations](#) explored alternative methods, such as improved public transport systems, which could unlock multiple benefits for current and future generations. The report is designed to show how the Well-being of Future Generations Act should be applied to solve congestion using the M4 Relief Road as an example. The underlying research and conclusions can and should be applied to other proposals, including the Red Route (A55/A494 corridor) scheme.

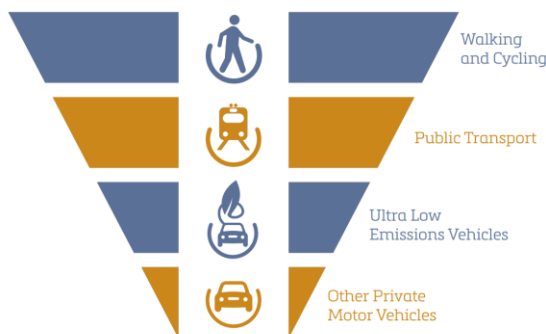
Because of the numerous application issues that were raised with me, I have recently written to the Minister for Economy and Transport, Ken Skates, to inform him of the issues raised with me and to advise that Welsh Government does not release funding for schemes that have not correctly

implemented WelTAG in Stage One. I attach this letter for your consideration. I have received a response from the minister, which is also attached. I strongly believe the Welsh Government must require comprehensive and demonstrable application of WelTAG before releasing any funds and I am currently concerned that this is not the case. I am due to meet with the Minister this week where I will follow this up.

You might also like to know that in response to the climate emergency declared by Welsh Government, I have also produced a [10-point plan](#) to fund the climate emergency. This includes a separate section on Transport and calls for Welsh Government to increase investment in active travel and the funding of public transport.

Finally, I would also point you to the latest edition of [Planning Policy Wales](#) which included a sustainable transport hierarchy, which placed private motor vehicles at the bottom:

Figure 8: The Sustainable Transport Hierarchy for Planning



Thank you again for seeking my views on this matter. I hope that you will find the above information useful.

Yours Sincerely



Sophie Howe