



Cyd-Bwyllgor Corfforedig  
Gogledd Cymru  
North Wales  
Corporate Joint Committee



# North Wales Regional Transport Plan

## Post Adoption Statement for the Integrated Wellbeing Appraisal

July 2025





# Post Adoption Statement for the Integrated Wellbeing Appraisal

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# 1 Introduction

This report forms the Post Adoption Statement (PAS)<sup>1</sup> for the Integrated Well-being Appraisal (IWBA) to accompany the final version of the North Wales Regional Transport Plan (NWRTP) 2025-2030. This report fulfils the plan and programme adoption requirement of the Environmental Assessment of Plans and Programmes Regulations 2004 (Strategic Environmental Assessment (SEA) Regulations).

Ambition North Wales will publish this PAS alongside the NWRTP and its IWBA once adopted, subject to Welsh Government approval, so that consultation bodies and those involved in the consultation process in relation to the development of the NWRTP can consider it. This PAS should be read together with the NWRTP, its IWBA, Delivery Plan, and Monitoring and Evaluation (M&E) Plan.

## 1.1 Overview

### 1.1.1 North Wales Regional Transport Plan

The Local Government and Elections (Wales) Act 2021 includes provision for the creation of Corporate Joint Committees (CJCs) which are formed to promote regional collaboration through a consistent and democratically controlled framework. CJCs are required to comply with all public body duties and are assigned statutory responsibility for the preparation of Regional Transport Plans (Regional Transport Plans)<sup>2</sup> which must set out transport policies to implement the Llwybr Newydd: the Wales Transport Strategy 2021<sup>3</sup>, providing a long-term vision for the next 5 years. The Wales Transport Strategy sets out the vision for an accessible, sustainable, and efficient transport system in Wales. The delivery mechanisms to realise these ambitions are the National Transport Delivery Plan (NTDP) for Wales 2022-2027, and at a regional level, the Regional Transport Plans.

### 1.1.2 Integrated Well-being Appraisal

The Welsh Government's Guidance to Corporate Joint Committees on Regional Transport Plans<sup>4</sup> sets out that an IWBA is required for the NWRTP, and supporting information should include more detailed statutory impact assessments, technical studies, consultation and engagement summaries, or other information that have been used to inform the development of the NWRTP or IWBA. It explains how current guidance on IWBA is set out in the Welsh transport appraisal guidance (WelTAG) guidance<sup>5</sup>.

It is a legal requirement for responsible authorities to undertake SEA of plans and programmes that are subject to preparation and/or adoption by an authority at a local, regional or national level, are required by legislative, regulatory or administrative provisions and result in development that may have significant environmental effects.

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<sup>1</sup> Also known as a Statement of Particulars

<sup>2</sup> CJCs also have responsibility for the preparation of Strategic Development Plans

<sup>3</sup> Llwybr Newydd: the Wales transport strategy 2021 – Available online at: <https://www.gov.wales/llwybr-newydd-wales-transport-strategy-2021>

<sup>4</sup> Regional transport plans: guidance for Corporate Joint Committee. Available online at <https://www.gov.wales/regional-transport-plans-guidance-corporate-joint-committees>

<sup>5</sup> Welsh transport appraisal guidance (WelTAG). Available online at: <https://www.gov.wales/welsh-transport-appraisal-guidance-weltag>



The NW RTP is a plan that is required by legislative provisions (CJC Regulations<sup>6</sup> post the Local Government and Elections (Wales) Act 2021<sup>7</sup>) and is likely to result in projects that could have significant environmental effects. SEA is therefore a statutory requirement, and the SEA process has been used as a basis for the IWBA because it is a recognised and systematic process for evaluating the environmental consequences of plans and programmes.

By expanding the SEA process to include the requirements of other assessments (as explained and listed in Section 2.2), the IWBA delivers one cohesive assessment using a collaborative approach across the different facets of sustainability, facilitating shared knowledge and identifying the intersectionality between the topics considered.

This approach eliminates unnecessary repetition and complies with all legal requirements. It also enables a thorough and transparent assessment that identifies sustainable development issues and opportunities, which can be iteratively fed back into the development of the NW RTP.

Figure 1-1 below sets out the main stages of the IWBA as it aligns with the development of the NW RTP. This approach eliminates unnecessary repetition and complies with all legal requirements. It also enables a thorough and transparent assessment that identifies sustainable development issues and opportunities, which can be iteratively fed back into the development of the NW RTP.

## 1.2 Purpose of this Post Adoption Statement

The Environmental Assessment of Plans and Programmes Regulations 2004 (Strategic Environmental Assessment (SEA) Regulations) requires that a Statement of Particulars (not a defined term) is made available as soon as reasonably practicable after the adoption of the plan. This statement must demonstrate:

1. How environmental considerations<sup>8</sup> have been integrated into the NW RTP (refer to Section 0);
2. How the IWBA Report has been taken into account during the preparation of the NW RTP (refer to Section 0);
3. How opinions expressed in response to the consultation on the IWBA Report have been taken into account (refer to Section 0);
4. The reasons for choosing the NW RTP, as adopted, in light of the other reasonable alternatives considered (refer to Section 5); and
5. The measures that are to be taken to monitor the significant environmental and wellbeing effects of the implementation of the NW RTP (refer to Section 6).

This Post Adoption Statement satisfies the requirement for a Statement of Particulars, and covers Stage D: Consultation and assessing significant changes and Adoption from Figure 1-1 below.

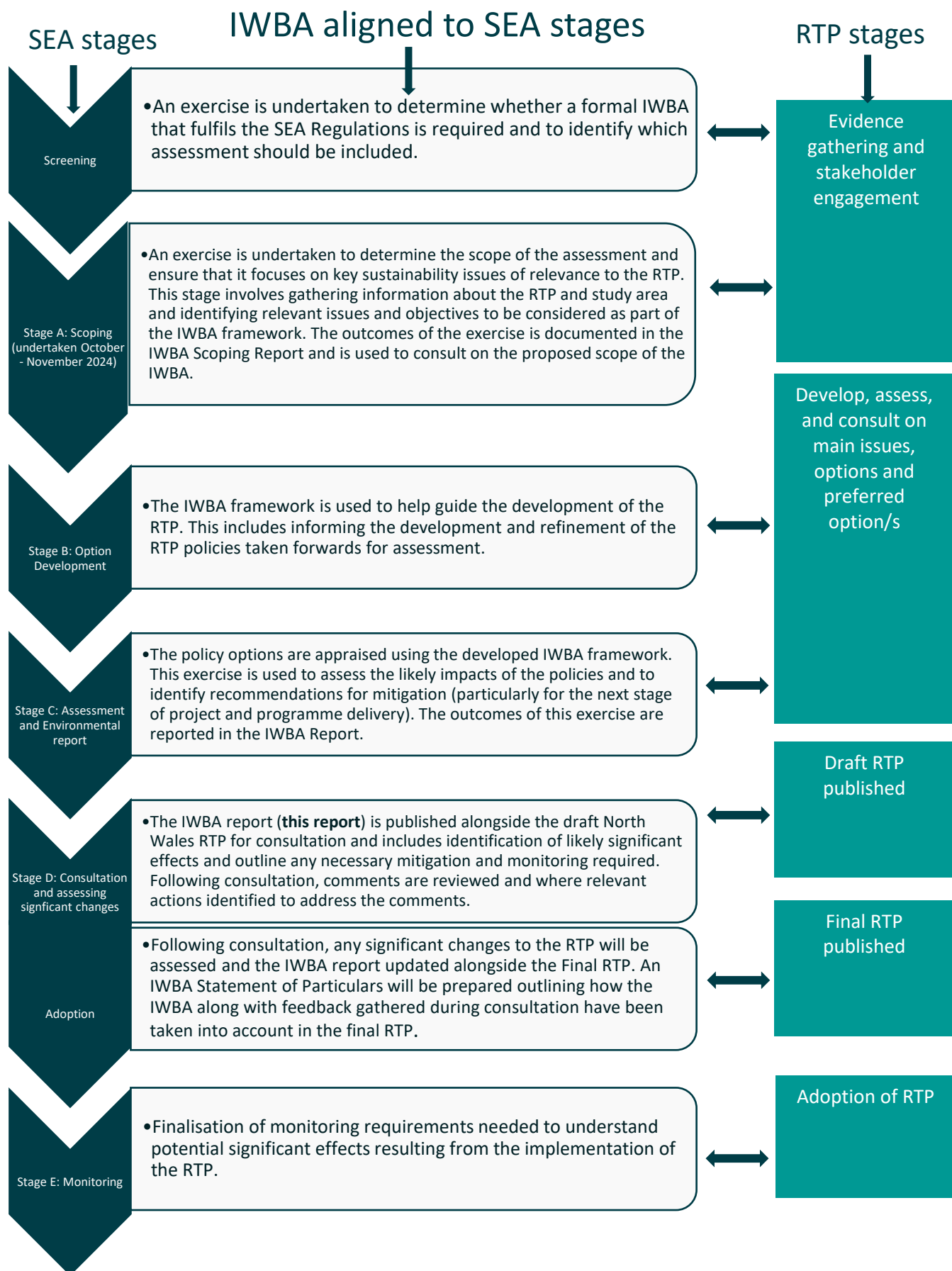
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<sup>6</sup> Consultation on the Corporate joint committees: draft statutory guidance, 2021. Welsh Government. Available online at: <https://www.gov.wales/consultation-corporate-joint-committees-draft-statutory-guidance-html> [Accessed 14/05/24]

<sup>7</sup> Local Government and Elections (Wales) Act 2021. Available online at: <https://www.legislation.gov.uk/asc/2021/1/contents> [Accessed 14/05/24].

<sup>8</sup> The IWBA shows how well-being has been considered in the development of the Regional Transport Plan. This includes contribution to economic, environmental, social and cultural well-being, and prepared applying the five ways of working advocated in the Well-being of Future Generations (Wales) Act 2015. While this PAS focuses solely on the environmental considerations, wellbeing has been considered as a broader requirements within the IWBA.

Figure 1-1: Stages of IWBA (aligned to SEA process) and NW RTP development



## 2 How environmental considerations have been integrated into the North Wales Regional Transport Plan

### 2.1 Overview

The NWRTP consists of four key SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) objectives. The SMART objectives aim to establish targets and ensure alignment between the Regional Transport Plan and the WTS priorities and well-being goals, as required by the Welsh Government's Regional Transport Plan Guidance. They promote environmental considerations through ambitions to reduce the need to travel, encourage modal shift to sustainable transport, and enable decarbonisation. They have informed and guide the NWRTP and its IWBA.

#### North Wales Regional Transport Plan SMART Objectives

1. *Improve digital connectivity and local services: We will enable 30% or more of people in North Wales to work remotely by 2030 through better land use planning and improved digital connectivity, which should reduce the overall need to travel and enable shorter trips better suited to sustainable modes.*
2. *Improved accessibility and transport choice: We will develop infrastructure and services that provide people with a choice about how they travel for each journey and support sustainable economic growth through improved access to key settlements, employment, educational sites and tourist attractions. The accessibility of each key trip attractor should be improved, supporting the national mode share target of 45% of journeys to be undertaken by walking, cycling and public transport by 2040.*
3. *Enable decarbonisation through transition to a zero-emission fleet: We will develop supporting infrastructure and support incentives to enable at least 50% of motor vehicles and all public buses operating in North Wales to be zero emission by 2035.*
4. *Enable Sustainable Economic Growth: We will develop a resilient, safe, well-maintained, and efficient transport network that delivers sustainable economic growth by improving accessibility to existing and planned employment areas. At least 50% of households in North Wales will have an increased range of travel within 1 hour by public transport, supporting access to key employment sites and regional centres by 2030.*

### 2.2 Environmental consideration within North Wales Regional Transport Plan

The IWBA shows how well-being has been considered in the development of the NWRTP including contribution to economic, environmental, social and cultural well-being, and prepared applying the five ways of working advocated in the Well-being of Future Generations (Wales) Act 2015. It also involves impact assessments, considering for example how the Plan has considered and contributes to wider quality, health and environmental outcomes.

The IWBA is predominantly qualitative in nature. Whilst the NWRTP is transport focused, it has the potential to support wider targets and have far reaching benefits including increasing physical activity of the population, habitat creation, improving equity of access to education and employment, stimulation of economic activity and boosting tourism. One of the primary functions of the IWBA is, therefore, to capture these wider benefits and integrate them into the development of the NWRTP.

To eliminate unnecessary repetition and ensure compliance with all legal requirements, the IWBA provides a single, cohesive assessment through a collaborative approach across various aspects of sustainability.



The expanded SEA process (as listed below) has been adopted as the foundation for the IWBA, as it is a recognised and systematic method for evaluating the environmental consequences of plans and programmes.

Where necessary IWBA can be used to show how the following legislative requirements are being met:

- Environmental Assessment of Plans and Programmes Regulations (SI 2004/1656) (Strategic Environmental Assessment (SEA) Regulations)
- Well-being of Future Generations (Wales) Act 2015
- Welsh Language (Wales) measure 2011 and Standards
- Children's Rights Impact Assessment (CRIA), as required by the Rights of Children and Young Persons (Wales) Measure 2011
- Equalities Impact Assessment (EqIA), as required by the Equality Act (2010)
- Sustainable Management of Natural Resources (SMNR) and the Natural Resources Policy (NRP) as required by the Environment (Wales) Act (2016)
- Habitat Regulations Assessment, as required by the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations 2017).

IWBA can also be used to incorporate the non-legislative requirements of assessments relating to:

- Rural proofing
- Health effects
- Climate change

12 no. IWBA objectives have been identified that include considerations of environmental issues outlined in the SEA regulations for assessing the potential impacts of the NWRTP and to place sustainable development at the centre of decision-making. The statutory and non-statutory assessments (as listed above) have been embedded within the IWBA report.

The IWBA objectives promote well-being and sustainable development considerations in the delivery of the NWRTP policies. The IWBA objectives are listed in Table 2-1 below. They span a wide range of environmental considerations, from health, biodiversity, landscape, cultural heritage, water, carbon, air quality, noise, materials and waste. These objectives will inform the delivery of the NWRTP policies.





Table 2-1: IWBA objectives contributing to WTS Environmental Ambitions

Ref.	IWBA Framework Objectives
1	Support the delivery of housing and local services to meet the needs of local communities
2	Reduce inequality and promote community cohesion
3	Improve the health and wellbeing of the local population, including with respect to physical and mental health
4	Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites, species and habitats
5	Protect and enhance local landscape character, designations and visual amenity
6	Protect and enhance the local cultural heritage, including the Welsh language
7	Protect and enhance the health of groundwater, surface and coastal waterbodies, water quality and water resources
8	Support a transition toward a transport sector with reduced (including zero) carbon emissions and enhance the resilience of transport infrastructure to withstand the effects of climate change
9	Protect and enhance local air quality
10	Reduce disturbance from transport related noise and vibration to local communities
11	Incorporate circular economy principles to reduce the use of raw materials
12	Create an integrated transport system that facilitates efficient and safe movement of both people and freight, contributing to increased economic prosperity in the region

### 2.2.1 Impact assessments

Transport can have impacts on land use which could lead to impacts on protected habitats. For this reason, consideration is given to how the NWRTP may impact on natural habitats and ecosystems. A separate HRA screening exercise has been undertaken (Appendix C of the IWBA report). The conclusions of the HRA screening exercise have informed the NWRTP.

In addition to the HRA screening exercise, an IWBA Scoping report was prepared, setting out the scope of the how each of the assessments would be captured within an integrated process, the context of the assessments and the NWRTP, establishing the baseline, reviewing the key plans, programmes and sustainability objectives relevant to the NWRTP, and identifying the appraisal objectives for the appraisal framework. The Impact Assessment Scoping Report was submitted for consultation with Statutory Consultees (Cadw and Natural Resources Wales) in addition to being shared with the Welsh Government, Transport for Wales and North Wales local authorities for any comments between 15<sup>th</sup> October 2024 and 19<sup>th</sup> November 2024. The scoping opinion of the statutory consultees are as follows:

- Cadw confirmed that Cultural Heritage is appropriately covered in the scoping report. They also sent the assessment team the Cadw paper on Historic Environment and Regional Transport Plans. Accordingly, the appraisal framework has been refined to include the factors recommended to be taken account of in the assessment.
- NRW did not provide any opinion.

The main environmental, social and economic issues of relevance to the NWRTP were identified during the Scoping stage using information gathered from the review of relevant plans, programmes and sustainability objectives, the baseline review, and the current understanding of the overarching scope of the NWRTP.



The anticipated environmental, economic, and social trends (assuming the NWRTP is not implemented) have been determined by analysing existing plans, programmes, and sustainability objectives, in conjunction with the current baseline data and historical patterns. These trends will serve as the ‘future baseline’ against which the NWRTP is evaluated.

Additionally, opportunities for the NWRTP to positively contribute to sustainability have been identified. These issues and opportunities serve as guidance for the development of the NWRTP, ensuring that negative effects are minimised and opportunities for maximising benefits are integrated into the plan. Given the strategic nature of the NWRTP, the identified opportunities and issues are currently at a high level. However, they already reflect the broader benefits that can be achieved through collaboration across sectors and jurisdictions.

None of the IWBA topics have been scoped out of the assessment. This is because transport planning has a wide range of likely significant effects, across all topics. Additionally, due to the integrated assessment approach, which includes certain statutory assessments, scoping out specific topics is not feasible.

A draft NWRTP and accompanying IWBA report was published between 20<sup>th</sup> January 2025 and 14<sup>th</sup> April 2025 for consultation, in accordance with the SEA regulations. Copies were sent to NRW and Cadw as statutory consultees alongside other stakeholders as part of public consultation. Specifically, the draft IWBA:

- Identified, described and evaluated the environmental effects of implementing the Plan;
- Identified actions to prevent, reduce or as fully as possible offset any adverse effects;
- Provided an early and effective opportunity to engage through consultation in preparation of the Plan;
- Proposed measures to monitor and evaluate the environmental effects of plan implementation.

The consultation exercise attracted a response from NRW, but Cadw did not offer further comments following the scoping consultation exercise. Other stakeholders and members of the public also made comments on the draft plans, including the IWBA.

The consultation process, responses, and how they’ve been taken into account, is set out in the Consultation Report. That document should be read alongside this Post Adoption Statement for further information and detail about the consultation and feedback.

Post consultation, the IWBA report has been revised, taking into account responses received to the consultation and it will be published alongside the final NWRTP and this Post Adoption Statement following Welsh Government approval.

## 3 How Integrated Well-being Assessment has been taken into account during the preparation of the North Wales Regional Transport Plan

### 3.1 Overview

The IWBA and the NWRTP have been running in parallel, enabling the integration of IWBA recommendations from the outset of the NWRTP's development. The IWBA is qualitative in nature and has consistently supported the preparation of the NWRTP at each stage. Sections 3.2 and 3.3 below describe how opportunities identified during the IWBA Scoping Assessment have been incorporated into the NWRTP.

### 3.2 Opportunities identified during the IWBA Scoping assessment

Opportunities for the NWRTP to positively contribute to sustainable considerations have been identified. These issues and opportunities served as guidance for the development of the NWRTP, ensuring that negative effects are minimised and opportunities for maximising benefits are integrated into the NWRTP. Given the strategic nature of the NWRTP, the identified opportunities and issues are currently at a high level. However, they already reflect the broader benefits that can be achieved through collaboration across sectors and jurisdictions.

This section summarises the sustainability issues and opportunities identified during the Screening and Scoping stage (refer to Figure 1-1 for a full description of the stages). The detailed sustainability issues and opportunities are captured in the IWBA report. In undertaking the IWBA scoping assessment, the sustainability mitigation and enhancement opportunities were identified, and are captured in Table 3-1.

Table 3-1: Sustainability issues and opportunities of relevance to the NWRTP

IWBA Topic	Issues relevant to the NWRTP	NWRTP opportunities identified
Population (communities)	<ul style="list-style-type: none"><li>Decreasing regional population size could impact the effectiveness or financial viability of some of the NWRTP options.</li><li>There is an aging population in North Wales which will impact transport needs, such as travel and commuting patterns.</li><li>There is lower diversity of ethnicities, religions, languages and LGBTQ+ populations than average, the NWRTP will need to ensure that it makes provision for these groups.</li><li>There is a high apprenticeship level and a relatively strong educational attainment across the region, therefore the NWRTP needs to ensure that the travel needs of young people are appropriately accommodated.</li><li>There is an existing lack of rural connectivity.</li></ul>	<ul style="list-style-type: none"><li>Help reduce isolation of rural communities through providing appropriate transport links to connect more remote communities, both to each other and to urban hubs and services.</li><li>Develop an integrated and efficient transport system which meets needs of all citizens, promotes equal opportunity, and supports projected population changes.</li><li>Develop transport initiatives which support the creation of safe, sustainable, balanced and cohesive communities.</li><li>Provide transport services that support changes in lifestyles and travel patterns in a post-pandemic society.</li><li>Creation of more inclusive transport options which also provide more equitable access to services and places.</li></ul>



IWBA Topic	Issues relevant to the NWRTP	NWRTP opportunities identified
Human health	<ul style="list-style-type: none"><li>Increased need for development of transport services to support an aging population.</li><li>The way in which transport availability impacts on mental health needs to be considered.</li><li>Increases in traffic can have an adverse impact on the physical and mental health and wellbeing on residents. This can be through severance, air quality issues, and reductions in tranquillity (noise).</li><li>Health inequalities are prevalent throughout the region which can be exasperated as a result of poor transport options (especially for people experiencing socio-economic disadvantage).</li></ul>	<ul style="list-style-type: none"><li>Improve the connectivity of communities and key health services to reduce prevalence of isolation and loneliness, improving traffic safety.</li><li>Creating more accessible public transport and providing public amenity (such as public benches and shelters).</li><li>Include health promotion measures such as those that promote physical activity (e.g. active travel, walking and cycling infrastructure) and social cohesion (e.g. improved access to services and community facilities).</li><li>Opportunities to enhance the transport network and infrastructure for the population with physical impairment / sensory loss, neurodiversity and disability needs (inclusive design).</li><li>There is the opportunity for the NWRTP to address socio-economic disadvantages (including issues of unemployment, lower educational attainment, housing insecurity and financial insecurity) through promoting the delivery of an inclusive, cost sensitive, sustainable transport network and infrastructure that connects employment opportunities to areas of higher deprivation to promote better mental and physical health.</li></ul>
Biodiversity	<ul style="list-style-type: none"><li>Designated sites present through the catchment that could be impacted by the placement of interventions, including through habitat loss and degradation.</li><li>Protected and priority habitats and species could be impacted by the placement of interventions, including through changes to habitat, and disturbance.</li></ul>	<ul style="list-style-type: none"><li>Built interventions could incorporate measures to restore, recover, reconnect, and enhance existing habitats to help minimise further biodiversity loss and habitat fragmentation and deliver a Net Benefit for Biodiversity.</li><li>There is opportunity to use a natural capital approach to help inform the development of interventions.</li><li>Built interventions could contribute to creating habitats that are more resilient to climate change.</li></ul>
Land use and landscape	<ul style="list-style-type: none"><li>Any intervention within the study area will need to be cognisant of landscape character and designations, such as Eryri National Park, Anglesey AONB, Llŷn AONB, and Clwydian Range and Dee Valley AONB to minimise any detrimental impact.</li></ul>	<ul style="list-style-type: none"><li>Sympathetic and community-led design can offer the opportunity to further enhance the landscape and character of different areas and change the way communities interact with them.</li><li>Reduce the negative impact of traffic on the setting of landscape designations through including measures to improve public transport and active travel infrastructure to access key assets such as Eryri National Park.</li><li>Enhance access to rural landscape through active travel networks; cycle/PROW network and public transport.</li><li>Protect and conserve soil resources.</li></ul>




IWBA Topic	Issues relevant to the NW RTP	NW RTP opportunities identified
Cultural heritage	<ul style="list-style-type: none"><li>• Potential for cultural heritage assets to be directly and indirectly impacted by physical changes to the built environment. This includes potential adverse impacts to the setting of heritage assets due to changes in the volumes and composition of traffic experienced in their locality.</li><li>• High proportion of Welsh language speakers and a strong cultural identity.</li></ul>	<ul style="list-style-type: none"><li>• Enhance bi-lingual aspects of the NW RTP and its proposals.</li><li>• Connect Welsh speaking communities, strengthening the cultural belonging and linguistic ties within the region.</li><li>• Enhance and integrate the network across the region and improve its resilience for the future to enable better and more inclusive access to significant cultural sites.</li><li>• Encourage the preservation and enhancement of the historic environment, including the setting of heritage assets.</li><li>• Avoid works which would alter the character or physical survival of heritage assets (including archaeology).</li></ul>
Ground conditions (soils and geology)	<ul style="list-style-type: none"><li>• Geological hazards, such as coastal erosion, have the potential to disrupt and damage transport infrastructure.</li></ul>	<ul style="list-style-type: none"><li>• Protect and improve the quality and quantity of groundwater resources.</li></ul>
Water environment	<ul style="list-style-type: none"><li>• Interventions associated with the NW RTP could contribute to the deterioration in WFD status of waterbodies (including groundwater), such as through changes to build infrastructure and drainage from the transport network.</li><li>• Transport infrastructure could be adversely impacted from flooding (river, surface water and coastal) and coastal erosion.</li></ul>	<ul style="list-style-type: none"><li>• Opportunities to meet the objectives for protected areas and achieving good overall Water framework Directive (WFD) status for surface and groundwaters should be explored, including mitigating adverse impacts of the transport sector. This should align with the local measures outlined in River Basin Management Plans and the catchment summaries of the opportunity catchments within the study area (i.e. Ynys Mon/Anglesey, Conwy, Clwyd and Dee).</li><li>• Where possible the NW RTP should seek to implement measures to restore and work with natural processes to maximise wider water environmental benefits and outcomes.</li></ul>
Climatic factors	<ul style="list-style-type: none"><li>• Future climate change is likely to increase the severity and frequency of extreme weather events including flooding and droughts and cause hotter summers and wetter winters. This has the potential to adversely impact transport infrastructure and cause travel disruption.</li><li>• Changes in climate are likely to affect travel choices people make. For example, wetter winters may deter people from choosing public transport options if there is no shelter available for waiting or if the services are unreliable.</li></ul>	<ul style="list-style-type: none"><li>• Opportunity to reduce emissions from transport by implementing low-carbon or zero-carbon solutions including reducing car trips, transition to zero-emission fleet and creating resilient and efficient transport networks.</li><li>• Incorporate measures to ensure that the transport network is resilient to the impacts of future climate change.</li></ul>





IWBA Topic	Issues relevant to the NWRTP	NWRTP opportunities identified
Air quality	<ul style="list-style-type: none"><li>• Air quality is generally good and not a major issue in the NWRTP area given that it is predominantly rural in nature.</li><li>• Promotion of a transition to electric vehicles can support reductions in air pollution associated with carbon dioxide, carbon monoxide and nitrous oxides (such as NO<sub>2</sub>). However electric vehicles still release particular matter pollution (PM<sub>10</sub> and PM<sub>2.5</sub>) associated with wear from tyres and breaks.</li><li>• There is a risk that new development in the area (such as the Anglesey Freeport and Wrexham Investment Zone) could increase the volume of freight travelling in the locality, leading to increase air pollution and worsening of local air quality</li></ul>	<ul style="list-style-type: none"><li>• In order to have the greatest impact on air quality, interventions should focus on reducing the number of vehicles on the road by supporting the transition to active travel and public transport wherever possible.</li><li>• Creation of active travel links that are sufficiently separated from road traffic can help reduce the amount of pollution that walkers and cyclists are exposed to and increase uptake in active travel through creating safe active travel options.</li><li>• The NWRTP should include relevant transport initiatives for businesses (e.g. promotion of transportation of goods by rail, and e-cargo bikes for small businesses in main towns) to ensure that the health of local communities and habitats are not detrimentally impacted.</li></ul>
Noise	<ul style="list-style-type: none"><li>• Noise pollution associated with roads is a key concern in the NWRTP area, particularly along major routes such as the A55.</li><li>• There is a risk that new development in the area (such as the Anglesey Freeport and Wrexham Investment Zone) could increase the volume of freight travelling in the locality, leading to increase in noise pollution and impact on local residents.</li></ul>	<ul style="list-style-type: none"><li>• The NWRTP has an opportunity to help reduce noise pollution experienced by local communities by reducing the number of vehicles on the roads (through promoting a transition to use of public transport and active travel) and supporting the transition to electric vehicles.</li><li>• The NWRTP should include relevant transport initiatives (e.g. promotion of transportation of goods by rail) to ensure that the health of local communities are not detrimentally impacted.</li><li>• Reducing road traffic noise (and ensuring that this does not increase) around Eryri National Park can help maintain and improve the tranquillity of the area and support health and wellbeing of users.</li><li>• The NWRTP should align with the Soundscape Plan for Wales where possible.</li></ul>
Infrastructure	<ul style="list-style-type: none"><li>• Over 1,000 new dwellings may need to be provided in North Wales each year to meet housing demand.</li><li>• House building rates vary across North Wales, with Denbighshire, Conwy and Isle of Anglesey having the highest completion rates and Gwynedd the lowest.</li><li>• Future hydrogen infrastructure, including production centres and transmission networks, are planned for North Wales that will link to Northwest England.</li><li>• Two locations within North Wales have been identified for large scale on-shore wind energy development.</li><li>• North Wales offers a variety of higher and further education institutes, including Bangor University.</li></ul>	<ul style="list-style-type: none"><li>• Holyhead Port plays an essential role in the international movement of imports and exports and also as a cruise port and the NWRTP should include appropriate interventions to support this asset.</li><li>• Enhancement of public transport connectivity of the higher and further educational establishments, health facilities, and other social infrastructure (e.g. libraries, social, religious, and leisure facilities) to local and regional communities.</li></ul>




IWBA Topic	Issues relevant to the NW RTP	NW RTP opportunities identified
Transport	<ul style="list-style-type: none"> <li>There are rural parts of North Wales that are more reliant on private car use and have less opportunity to benefit from other modes of public transport and active travel initiatives.</li> <li>A very small proportion of people in North Wales live close to rail stations with frequent services.</li> <li>There are limited freight services on the rail network.</li> <li>Incidents on the Menai Crossings to Anglesey have an adverse impact on connectivity, journey reliability and crossing times.</li> <li>Long distances to key services, resulting in high rates of car ownership and low levels of walking and cycling.</li> <li>There is currently little provision in North Wales for road freight operators seeking a switch to cleaner fuels.</li> <li>Car parking is a contentious issue at key beauty spots including within Eryri National Park.</li> </ul>	<ul style="list-style-type: none"> <li>To enhance rail services, the key priorities for improvements are the Borderlands Line, increasing capacity at Chester Station, and increased service levels on the North Wales Main Line. Consideration should be given to the importance of connections to key centres such as London, Cardiff, Manchester (including the airport), Liverpool, Crewe, and Warrington (for Northern Powerhouse Rail). Consideration should also be given to sustainable travel links to interchange facilities at rail stations.</li> <li>Influence bus services to see that timetables, routes and fares better meet local needs and demand.</li> <li>Support initiatives to decarbonise the freight and logistics networks in North Wales, e.g. through increasing the proportion of freight carried on the North Wales Main Line.</li> <li>The NW RTP can help implement measures to increase provision and use of public transport and active travel.</li> <li>Future proofing planned transport infrastructure.</li> <li>The NW RTP should include interventions to support and improve public transport links with Chester as this is an important gateway for North Wales and key link for the north-east Wales economy.</li> <li>Improvements to public transport and active travel access to tourist attractions.</li> </ul>
Resources and waste	<ul style="list-style-type: none"> <li>There are existing mineral reserves within Wales, however some areas will experience shortfalls in material available in the future unless new allocations are identified. Built infrastructure required as part of the NW RTP should resource material as locally as possible to reduce emissions, freight and support the local economy.</li> </ul>	<ul style="list-style-type: none"> <li>The NW RTP should incorporate circular economy principles. This includes reducing the need to build infrastructure in the first place, reusing recycled materials and reducing use of raw materials.</li> <li>Improve on energy efficiency across the transport network.</li> </ul>

### 3.3 Outcome through the IWBA environmental objectives

The opportunities identified during the Screening and Scoping stage informed the NW RTP. The IWBA identified overall significant positive effects of the NW RTP policies against each of the IWBA objectives. A summary of the outcomes is presented below.

Moreover, a draft IWBA that was made available for public consultation alongside the draft NW RTP documented the potential beneficial and adverse effects of the proposed plan objective, priorities and measures and identified mitigation and enhancement opportunities.



## Objective 1: Support the delivery of housing and local services to meet the needs of local communities

Policies related to enabling changes in travel behaviour (CB1-CB15) emphasise enhancing public transport services and active travel routes, which are crucial for improving access to employment sites and essential services such as healthcare, education, and transport interchanges. By focusing on the needs of local communities, particularly in areas with high levels of deprivation, these initiatives aim to provide sustainable transport options that improve connectivity while reducing reliance on private vehicles, particularly in rural areas. This approach not only addresses immediate travel needs but also has the potential to promote long-term housing growth in areas where access to services is improved. Furthermore, the collaborative planning approach across North Wales and with neighbouring authorities would ensure that transport solutions are tailored to community needs, fostering greater social inclusion and cohesion.


Policies related to public transport (PT1-PT15) in North Wales highlight a comprehensive approach to enhancing public transport through improved ticketing, better journey and waiting times and accessible, reliable services. This ensures reliable access to essential services like employment, education and social opportunities. This would be particularly beneficial in areas that are more deprived where people may be more reliant on public transport including areas such as Holyhead Town, Marchog, Peblig, Glyn and Rhyl that lie within the 10% most deprived areas.

The policies aim to improve connectivity by supporting viable transport options to meet diverse community needs, particularly benefiting residents of rural areas through safe, flexible and community-led transport solutions. Since these policies enable flexible services which have been designed through community involvement and are locally run and managed, they would improve access to local services and help meet community identified specific needs. Policies related to active travel (AT1-AT14) focus on enhancing active travel infrastructure to promote healthier lifestyles and equitable access to services such as healthcare, education and transport interchanges. Integrated transport policies (IN1-IN6) would also facilitate improved accessibility to services and improved affordability for multimodal travel. This would be achieved through better integration of bus and rail networks with development of mobility hubs, improved active travel accessibility to further transport and Park & Ride / Park & Share schemes. It would be particularly beneficial where public transport options are scarce or not suitable.

The policies regarding port developments and freight (PF1- PF9), support the delivery of local services by improving access to essential resources for local communities, particularly in deprived areas like Holyhead and Mostyn. The policies would also enhance employment opportunities within the ports as they expand and the focus on sustainable transport connectivity to port developments and rail stations improves accessibility for local communities to those economic opportunities. Policies PF1-PF9 also support the needs of local communities by improving the local delivery system (making them easier and quicker to use) and contributing to reducing congestion which benefits the local environment and amenity.

Policies related to roads, streets and parking (RS1-RS13) support road infrastructure improvements that are climate resilient, facilitating the delivery of housing and access to existing and future services. They also contribute to the mitigation of adverse impacts such as travel delays caused by damage to infrastructure that is not regularly maintained. Improvements to road infrastructure also helps reduce the risk of accidents which has high economic and personal costs associated with it.

Sustainable transport options are encouraged through control of parking charges and reallocation of space from parking (RS5 – RS6) which aim to improve local amenity and encourage a greater uptake in public transport and active travel. However, there may be adverse impacts if reduced parking/increased parking charges is not balanced by sufficient and suitable alternative active transport options/ public transport because this would reduce accessibility to services. Improved availability of sustainable transport services improves accessibility to essential services for those that rely more on public transport as well as for those who would prefer to use public transport but feel that they currently do not have a reasonable alternative to the car.



Policies enhancing digital connectivity (DC1-DC2) facilitate remote working and improve access to services, including increased access to employment opportunities with a reduced need to travel. They also enable more members of communities to travel using public transport more confidently through digital literacy initiatives.

Largely, the assessment reveals that all policies do not have a significant impact on the delivery of housing services, although policies relating to improvements and/or promotion of active travel, would contribute to providing any new housing with appropriate active travel connectivity to existing services.

## Objective 2: Reduce inequality and promote community cohesion

Enhancement of public transport services, particularly supported by Policies PT1-PT10, supports access to essential services, employment, training and education opportunities, as well as to recreational opportunities. This benefits everyone but particularly people who are more reliant on public transport and/or active travel including socio-economically disadvantaged people, younger people, older people, disabled people, and people from global ethnic majority groups<sup>9</sup>. These policies focus on creating a more integrated transport network that facilitates easier movement between communities and encourages active travel modes like walking and cycling. This approach is expected to foster social interactions, reducing social isolation, and enhancing overall community well-being.

Furthermore, by prioritising connecting rural areas to neighbouring communities and community facilities, the policy improves access to essential services like health, education and employment in rural and semi-urban areas reducing inequality of opportunity that can arise as a result of lack of transport connectivity in rural areas. Enhancement of services does not specifically mention accessibility improvements, resulting in an uncertain impact in this regard. For example, no policy specifically defines which accessibility standards should be followed to ensure accessibility for all users.

Policies PT11 – PT15 emphasise flexible, community-led and public transport solutions that cater to vulnerable and isolation populations such as people living in deprived areas, older people and people with disabilities, enhancing mobility and social interaction. The promotion of taxi services that promotes safe travel of passengers would be particularly beneficial for vulnerable groups at higher risk of experiencing hate crimes, such as the LGBTQ+ community, and people who are racialised<sup>10</sup>.

Policies related to walking, cycling and wheeling (AT1 – AT14) aim to improve active travel infrastructure, making walking and cycling more accessible for people with disabilities or mobility impairment, older people and other wheelchair users and people with infants in prams, and for people experiencing deprivation who do not have access to a vehicle/bike. This reduces inequality of access to transport as does improve multimodal transport (IN1 – IN6) which helps improve connectivity to central locations. However, Policies IN5 – IN6 could result in further social exclusion when P&R (or P&S) facilities are developed at the expense of investment in conventional public transport and if services are exclusively aimed at motorists (i.e. people can only use the bus service when they have parked their car, because this excludes people who do not own a car)<sup>11</sup>.

By improving sustainable transport options to ports, particularly in deprived areas, these policies create better access to employment opportunities at port developments (and within areas on the port public transport routes), which would contribute to a reduction in economic inequality between areas of North Wales.

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<sup>9</sup> Welsh Government (2014) National Survey for Wales – Transport. Available online at: <https://statswales.gov.wales/Catalogue/Transport>

<sup>10</sup> Out in London: LGBTQ+ People's Safety on London's Transport Network. London Travel Watch, 2023. Available online at: <https://www.diversitytrust.org.uk/2023/11/new-study-lgbtq-people-feel-threatened-and-face-abuse-on-london-public-transport/> [Accessed 15/11/24]

<sup>11</sup> Parkhurst, G. Social inclusion implications of park-and-ride. *Municipal Engineer* 156, 2003



The improved road safety and local amenity as a result of rerouting HGVs to more suitable rest locations would be beneficial for communities that are close to the port and which experience more socio-economic deprivation than other areas in North Wales.

Encouraging the switch to low emission vehicles, and modal shift to public transport/active travel would contribute to a reduction in air emissions, particularly for communities along the North Wales coast. This would bring health benefits, particularly for vulnerable groups who are more sensitive to changes in air quality including children, older people, people with respiratory disease and pregnant women.

A reduction in road freight vehicles with a shift to rail supported by Policy PF9 could lead to loss of employment for HGV drivers which would disproportionately impact men who are more likely to be employed in the road haulage sector.

Policies DC1-DC3 focus on improving digital infrastructure and literacy, supporting opportunities for remote working whilst also enhancing accessibility of digital information that helps people plan journeys using public transport (i.e. digital access to real time service information).

This would support people less able to travel for work such as disabled people, pregnant women, people with caregiving responsibilities and young people, whilst also supporting people who are more likely to be digitally illiterate (older people).

Overall, policies are supportive in strengthening community ties and fostering a more equitable and inclusive society.

### Objective 3: Improve the health and wellbeing of the local population, including with respect to physical and mental health

Policies CB1 – CB23 focus on enhancing public transport services and active travel routes to improve connectivity between residential areas and key employment sites, city centres, and cross-border regions. These improvements would encourage modal shift, encouraging increased physical activity levels which promotes improved health outcomes including reducing risks of chronic diseases like obesity, cardiovascular issues, and diabetes, whilst also enhancing mental wellbeing<sup>12 13</sup>. These policies would achieve this by contributing to better access to sustainable transport options, which helps to alleviate social isolation, particularly among vulnerable groups such as older people, young people, socioeconomically disadvantaged, and disabled people who are more reliant on public transport. Furthermore, improved access to essential healthcare services, recreational spaces, and community facilities, which means that people can more easily access the healthcare and services they need whilst also fostering community cohesion, contributing to overall improved health and wellbeing.


Policies PT1-PT10 focus on improving the bus network and would be crucial for connecting individuals to key health services, recreation activities and green spaces. This increases better (simplified) access to opportunities for physical exercise (gyms, parks, natural areas, etc.) contributing to improved health outcomes for all, but particularly for groups who rely more on public transport. An improved bus network with transport hubs would also encourage physical activity, as users are more likely to walk or cycle to these transport hubs. The policies also contribute to reduced air pollution and improved road safety, providing health benefits to communities in deprived and low-income areas. Policies PT11 to PT15 include demand-responsive transport solutions with a particular focus on meeting the travel needs in rural areas. This would contribute to improved health for rural communities as they would be more able to access healthcare along with opportunities for recreation, employment, education and social interactions.

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<sup>12</sup> Cycling and walking for individual and population health benefits: A rapid evidence review for health and care system decision makers. Public Health England, 2018. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/757756/Cycling\\_and\\_walking\\_for\\_individual\\_and\\_population\\_health\\_benefits.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757756/Cycling_and_walking_for_individual_and_population_health_benefits.pdf) [Accessed 12/11/24]

<sup>13</sup> Health benefits from recreation, natural capital, UK - Office for National Statistics





Policies like PT13 focus on low-emission vehicles which would contribute to mitigating adverse health impacts caused by air pollution such as respiratory infections, heart disease and stroke<sup>14</sup>.

The active travel Policies (AT1 to AT14) would create supportive environments for active travel through investments in infrastructure that would make active travel more attractive, safer and accessible to a wider range of the population including people with infants in prams, people in wheelchairs, and disabled people (particularly with difficult mobility). These investments would promote better access to active travel, increasing travel choice, agency, community engagement and access to social infrastructure that contributes to better physical and mental health outcomes.

Policies IN1 to IN6 advocate for an integrated transport network that simplifies transitions between various modes. This includes simplified and integrated ticketing, placemaking and wayfinding, and improved convenience when transitioning between transport modes (e.g. from bike to bus or train or from train to bus). This would improve connectivity between local communities and larger settlements, reducing social isolation for less well-connected areas (particularly rural areas). Collectively, these initiatives contribute to a healthier, more cohesive society by prioritising safety, accessibility, and inclusivity in transportation.

The policies relating to port developments (PF1 – PF9), have mixed impacts on health. Whilst they support the health and wellbeing of the local population by providing sustainable transport options to employment opportunities in Holyhead and Mostyn ports, the anticipated increase in heavy goods vehicle (HGV) movements due to port expansion poses risks to local air quality and noise levels, potentially adversely affecting communities along the road routes to the Ports. Vulnerable groups including children, people with respiratory disease and older people would be more affected by any decreases in air quality. Conversely, a shift to hydrogen fuels for road and rail freight, along with the introduction of freight consolidation centres and EV for local deliveries, would contribute to reduced traffic and improved air quality for local communities. Where there is an increased use of e-cargo bikes for local deliveries this could cause anxiety for some pedestrians if they are ridden on shared spaces and cyclists of e-bikes themselves can experience increased anxiety levels when cycling in busy urban areas<sup>15</sup>.

Policies PF1-PF9 support the health and wellbeing of HGV drivers with the provision of rest facilities, reducing fatigue and anxiety amongst drivers and reducing risks of accidents and improving overall road safety.


Policies RS1-RS13 which relate to roads and streets contribute to the creation of road infrastructure that is better maintained, safer for pedestrians, cyclists and motorists, and better able to support the changing needs of EV vehicles. These policies therefore support continued connectivity between communities and essential services, including healthcare, employment, education and recreational facilities. Better maintained infrastructure is also more resilient to extreme weather events which means that there would be less disruption during such events, maintaining access to social infrastructure. Whilst reduced car parking and increased charges would encourage reallocation of space to uses that may encourage more physical activity (e.g. improved pedestrian areas, urban green spaces) it may also induce anxiety for some people if they worry about the ability to find suitable parking or about the increased cost of parking. This would potentially deterring access to urban areas negatively impacting physical and mental health as access to services becomes more challenging.

Policies (DC1 – DC3) which focus on enhancing digital connectivity and digital literacy would (DC1 – DC3) aim to facilitate remote working and improve connectivity between communities, including more rural areas.

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<sup>14</sup> European Environment Agency, Health impacts of air pollution, 2022; Available online at: [Health impacts of air pollution in Europe, 2022 — European Environment Agency](#) (Accessed 27/11/2024)

<sup>15</sup> Pejhan, S., Agelin-Chaab, M., Yusuf, M., & Eng, D. Analysis of ebike dynamics and cyclists' anxiety levels and interactions with road vehicles that influence safety. *Accident Analysis & Prevention*, Volume 159, 2021.



By reducing the need for travel, these policies can alleviate commuting-related stress, make employment opportunities accessible to people who may otherwise struggle to find suitable employment (e.g. people with caring responsibilities or disabled people). These increased opportunities alongside better connectivity promote better mental and physical health outcomes.

#### Objective 4: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites, species and habitats

Where policies of the NW RTP aim to increase use of active travel and public transport, and/or increase use of low emission vehicles, this would result in a reduction in emissions and pollution run off from roads, both of which can adversely impact species and habitats. This includes policies which aim to improve and enhance sustainable transport options so that there is a modal shift (both active travel and public transport) (Policies CB1-CB23, PT1-PT10, AT1-AT6, IN1-IN6), as well as policies which aim to enhance accessibility and connectivity of those sustainable transport options (PT11-PT13 and DC1-DC3). In both cases it is likely that there would be a modal shift away from the private car resulting in positive effects on biodiversity. Improved sustainable travel options to access tourist attractions including national parks and coastal areas, help prevent ecological damage caused by inappropriate parking. At this stage it is not known whether infrastructure improvements would require any physical land take. For example, active travel infrastructure and P&R and P&S schemes (IN5-IN6) pose potential risks to biodiversity and geodiversity, if not sensitively designed, given the unknown status of development locations and land take requirements. Careful planning will be required at project level to mitigate potential negative impacts on biodiversity.

Policies IN1 to IN6 facilitate seamless transitions between transport modes, encouraging a modal shift to sustainable transport, while safeguarding ecological sites.

However, Policies aimed at enhancing ports and freight infrastructure (PF1 – PF9), present potential risks to biodiversity where this increases land take and development. This would particularly be the case for designated sites like the Anglesey Tern Special Protection Area and the North Anglesey Marine Special Area of Conservation where development activities may increase pressures on these sensitive habitats. As the land requirements and locations of any development at ports (or related to ports such as freight consolidation centres and rest facilities for HGV drivers) outlined in policies is unknown, the impact on biodiversity interests in these cases is uncertain.


Policies RS1 – RS13 contribute to enhancing biodiversity where the policies result in space currently dedicated to parking being replaced by high quality place-making that includes ecological enhancement (net benefit for biodiversity). Policy RS2 particularly focuses on enhancing biodiversity interests to contribute to climate and ecosystem resilience.

While digital connectivity policies (DC1 – DC3) do not directly address biodiversity, they can facilitate reduced travel needs, leading to lower emissions and less disturbance to natural habitats.

#### Objective 5: Protect and enhance local landscape character, designations and visual amenity

The policies with the NW RTP are not anticipated to impact Best and most versatile (BMV) agricultural land. However, where infrastructure developments are proposed, there is no additional information about locations and land take, and which results in an uncertain impact. Therefore, careful planning and consideration is recommended during implementation.

Policies CB1 – CB23 and PT1-PT15 focus on enhancing public transport services and active travel routes contributing towards mitigating the adverse impacts of increased traffic, particularly in sensitive areas such as Eryri National Park. By promoting sustainable travel options, these policies can help reduce tourism induced road congestion and parking pressures, thereby mitigating adverse impacts of inappropriate parking on visual amenity in these areas and maintaining the integrity of local landscapes.



Transport infrastructure enhancements may result in adverse effects on designations and landscapes where physical changes are required (e.g. road building, port expansion, and parking or active travel infrastructure) so careful planning and implementation will be crucial at project level to ensure that any associated developments do not impact the area's scenic and cultural value.

While policies AT1 - AT14 support improvements to active travel infrastructure, making active travel more accessible, even to tourists, the policies are unlikely to reduce vehicle usage in more remote areas which are noted for their special landscape character. Policies IN1 - IN6 promote the development of mobility hubs and better integration of public transport, facilitating transitions between transport modes and supporting a modal shift from private vehicles to sustainable transport. This shift is expected to alleviate adverse effects of traffic congestion and parking pressures on popular tourist destinations, enhancing visual amenity.

### Objective 6: Protect and enhance the local cultural heritage, including the Welsh language

Policies of the NWRTP which aim to improve public transport services and active travel infrastructure (CB1 – CB23; PT1 – PT15; AT1 – AT14; IN1 – IN6), would facilitate better connectivity between communities and key cultural sites as well as Welsh medium educational facilities. By reducing traffic congestion and enhancing accessibility, these initiatives make it easier for individuals, particularly those without private vehicles, to visit cultural venues, heritage sites, and improve connectivity between local Welsh-speaking communities. This increased patronage of cultural attractions supports their economic viability.

Improved connectivity between Welsh-speaking communities and to educational resources for learning Welsh, are crucial for promoting the daily use of the Welsh language.

The policies support initiatives that create opportunities for community engagement and improving access to social opportunities for Welsh speaking communities, especially in areas of Gwynedd and Anglesey that consist of the highest proportion of Welsh speakers.

The policies would also facilitate the use of Welsh language in social and community spaces such as transport interchanges, bus waiting areas, bus stops and buses themselves in verbal and written formats.<sup>16</sup>

Overall, the Policies collectively contribute to the preservation and promotion of local cultural heritage without posing risks to designated heritage assets.

### Objective 7: Protect and enhance the health of groundwater, surface and coastal waterbodies, water quality and water resources

Policies of the NWRTP which aim to enhance public transport services and active travel routes and thereby encourage a modal shift away from private vehicles would reduce the volumes of traffic on the roads. Volumes of traffic on roads would also be decreased by Policy PF9 which supports a shift to rail freight, and Policies DC1-DC3 which focus on digital connectivity reduce travel needs by supporting remote working opportunities and encouraging public transport use. This reduction in road traffic, particularly from HGVs would lead to several environmental benefits: fewer vehicles mean less oil, grease, and other pollutants entering waterways during rain events, thereby improving the quality of rivers, lakes, and streams and protecting aquatic ecosystems.

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<sup>16</sup> Welsh Government, 2024. Cymraeg 2050: Welsh language strategy action plan 2024 to 2025. Available online at: <https://www.gov.wales/cymraeg-2050-welsh-language-strategy-action-plan-2024-2025-html> [Accessed 13/11/24]



Additionally, decreased traffic lowers airborne pollutants that can settle on surfaces and subsequently wash into water bodies, including harmful nitrogen oxides and sulfur dioxides that contribute to nutrient pollution<sup>17</sup>. Conversely Policy PF3 supports the delivery of infrastructure for improving HGV movements and providing specific HGV facilities which would result in an intensification of HGVs in some locations therefore an intensification of pollution and carbon emissions from HGVs that result in the runoff of road pollutants into water bodies.

In addition, any development works required to introduce new physical infrastructure (e.g. road engineering works for bus lane introductions) has the potential to result in adverse effects during construction if not appropriately mitigated. Policy PF4 also has potential to negatively impact water resources as the development of hydrogen hubs would require water for hydrogen production as well as other services like cooling. There are risks to human and aquatic life associated with potential leakage of ammonia used in hydrogen production<sup>18</sup>.

Policies concerning port development (PF1 – PF9) have the potential to adversely impact the quality of water bodies nearby (through pollution runoff). However, at this stage there is insufficient information detail about what port expansion would and therefore any impact is uncertain. Further, by promoting a modal shift from road to rail for freight transport, the policies aim to reduce the number of heavy goods vehicles (However, there are concerns regarding increased port activities and the development of freight consolidation centres, particularly under Policy PF3, which may lead to a rise in HGV traffic and associated pollution. Policy AV1 related to surface access to aviation is not anticipated to affect water quality.

### Objective 8: Support a transition toward a transport sector with reduced (including zero) carbon emissions and enhance the resilience of transport infrastructure to withstand the effects of climate change

Policies within the NWRTP which focus on improving and enhancing sustainable transport options such as public transport and active travel would facilitate a modal shift away from private vehicles, leading to lower transport related carbon emissions. This includes Policies CB1-CB23, PT1-PT10, AT1-AT14 and IN1-IN6. By integrating zero-emission vehicles into public transport systems (PT2- PT3) and improving infrastructure resilience to adverse weather, these policies aim to mitigate the impacts of climate change on transport networks.

For example, offering links to alternative public transport services when particular route/s are affected by extreme weather events such as flooding. These initiatives are expected to contribute positively to achieving Wales's net-zero targets by 2050, while also enhancing the adaptability of transport infrastructure in the face of climate-related challenges. Additionally, with a shift to cleaner fuels and zero-emission vehicles, policies support the decarbonisation of the transport sector and improve climate resilience of the transport network with reduced dependency on fossil fuels and related disruptions caused to their supply chain through climate change<sup>19</sup>.


Policies PT11 - PT15 emphasise community-led transport initiatives, such as the Fflecsi, Dynamic Demand Responsive Transport, and rail travel, which helps reduce reliance of private vehicles and reduce emissions in rural areas. However, it is unknown whether community transport will be zero/low emissions, and the impact is therefore uncertain.

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<sup>17</sup> Environmental Agency 2019, 2021 River basin management plans – Pollution from towns, cities and transport. Available online at: [https://consult.environment-agency.gov.uk/++preview++/environment-and-business/challenges-and-choices/user\\_uploads/pollution-from-towns--cities](https://consult.environment-agency.gov.uk/++preview++/environment-and-business/challenges-and-choices/user_uploads/pollution-from-towns--cities) [Accessed 25/11/24]

<sup>18</sup> Hydrogen: A renewable energy perspective. A report prepared for the 2<sup>nd</sup> Hydrogen Energy Ministerial Meeting in Tokyo, Japan. 2019. International Renewable energy Agency. Available online at: [https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2019/Sep/IRENA\\_Hydrogen\\_2019.pdf](https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2019/Sep/IRENA_Hydrogen_2019.pdf) [Accessed 12/11/24]

<sup>19</sup> International Renewable Energy Agency (IRENA), Bracing for Climate Impact: Renewables as a Climate Change Adaptation Strategy, August 2021; Available online at: [Bracing for Climate Impact: Renewables as a Climate Change Adaptation Strategy](#) (Accessed 25/11/2024)



Policies PF1 – PF9 aim to support the growth of the regional ports and associated infrastructure which are accessible by sustainable (decarbonised) transport options. However, the policy initiatives may result in increased HGV traffic which currently are less likely to be decarbonised. However, the introduction of hydrogen hubs to support hauliers in the region switch to low emission vehicles (PF4) along with a shift to rail freight (PF9) offers promising avenues for reducing emissions.

In relation to local deliveries, Policies PF5-PF8 support for the use of electric vehicles and e-cargo bikes, contributing to decarbonisation and mitigating the environmental impacts of caused by local deliveries. A wider shift to EVs more generally is supported by Policies RS7-RS11 which aim to improve EV charging infrastructure across the region, contributing to the decarbonisation of the transport sector.

Policy AV1 improves public transport connectivity to airports, which could indirectly lead to increased air travel emissions, being an adverse effect on the aim to reduce emissions. Policies DC1-DC3 focus on digital connectivity and therefore supports carbon reduction by facilitating remote work, reducing the need to travel. In addition, improved digital access to public transport information, would make it easier to travel using sustainable transport modes, also reducing carbon emissions.

### Objective 9: Protect and enhance local air quality

Where policies of the NWRTP aim to increase use of active travel and public transport, and/or increase use of low emission vehicles, this would result in a reduction in emissions which can adversely impact air quality. This includes policies which aim to improve and enhance sustainable transport options so that there is a modal shift (both active travel and public transport) (Policies CB1-CB23, PT1-PT10, AT1-AT6, IN1-IN6), as well as policies which aim to enhance accessibility and connectivity of those sustainable transport options (PT11-PT13, and DC1-DC3). In both cases it is likely that there would be a modal shift away from the private car resulting in reduced emissions and subsequent improvements in air quality. Additionally, Policies which seek to support the transition to low (zero) emission vehicles would be beneficial to air quality (PT2-PT3, AT12-AT14, PF4, and RS7-RS11).

Improved air quality would benefit everyone, but vulnerable groups who are more sensitive to changes in air quality including children, people with respiratory disease, pregnant women and older people<sup>20,21</sup>, would benefit disproportionately and differentially. More urban centres which have more road transport such as Wrexham and Bangor, as well as the main roads and routes with heavy traffic congestions such as A5, A55 and A4807, are locations where improvements in air quality are more likely to be experienced. These areas often correspond to areas where people experience socio-economic deprivation.

The policies focused on port development and freight (PF1 – PF9), promote sustainable transport options to ports and rail stations, helping reduce traffic emissions and improve air quality in areas around Holyhead and Mostyn.


However, the policies may result in an increase of HGV movements likely contributing to adverse air quality impacts for local communities near port development areas. Policy PF3 would have the potential to improve air quality for some areas as a result of reduced congestion caused by HGVs but reduce air quality in the areas to which HGVs are directed (e.g. parking specifically for HGVs would concentrate a large number of HGVs in one location). A shift to hydrogen fuels and rail for freight movements and zero emission vehicles for local deliveries would contribute to improved air quality conditions for local communities.

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<sup>20</sup> World Health Organisation, Health consequences of air pollution on populations, June 2024; Available online at: [Health consequences of air pollution](#) [Accessed 14/11/2024]

<sup>21</sup> Health impacts of air pollution in Europe, 2022 — European Environment Agency. Available online at: <https://www.eea.europa.eu/publications/air-quality-in-europe-2022/health-impacts-of-air-pollution> [Accessed 27/11/24]





Policies DC1-DC3 focus on digital connectivity and therefore supports a reduction in emissions by facilitating remote work, reducing the need to travel. In addition, improved digital access to public transport information, would make it easier to travel using sustainable transport modes, also reducing transport related emissions.

### Objective 10: Reduce disturbance from transport related noise and vibration to local communities

Policies of the NWRTP which aim to improve and enhance sustainable transport options (Policies CB1-CB23, PT1-PT10, AT1-AT6, IN1-IN6), as well as policies which aim to enhance accessibility and connectivity of those sustainable transport options (PT11-PT13, and DC1-DC3), are likely to result in a modal shift away from the private car (to active travel and public transport use) resulting in less traffic and reduced transport related noise and vibration.

This would be particularly beneficial in areas identified as noise priority zones, such as along the A55 and A483, as well as more generally improving local soundscapes and tranquillity in residential areas.

Policies PF1-PF9 relate to enhancement of port facilities and facilities for freight drivers. The increased economic activities in the port and nearby development areas may lead to some increased noise from transport, including within residential areas outside the port. Improvements in HGV facilities (rest stops and parking) would increase noise in the locations chosen for these developments. However, it is anticipated that site selection would include consideration of noise impacts on residents which would mitigate this adverse effect. Reduced HGV traffic in town centres, supported by freight consolidation centres and a shift to rail freight, as well as uptake in EV would also contribute towards reducing traffic related noise disturbances.

Policies RS1-RS13 support road maintenance and safety which would help reduce noise and vibration caused by poorly maintained roads.

Reduced road traffic as a result of the initiatives supported by DC1 – DC3, could lead to reduced disturbances from transport related noise and vibration to local communities living near major roads. Policies DC1-DC3 focus on digital connectivity and therefore contributes to a reduced need to travel, particularly in relation to employment. In addition, improved digital access to public transport information would make it easier to travel using sustainable transport modes resulting in modal shift and reduced private vehicle use. Both of these would reduce noise related to transport movements.

### Objective 11: Incorporate circular economy principles to reduce the use of raw materials

Policies PT2, PT3 and PF4 (freight movements) support the transition to cleaner fuels alongside the development of hydrogen hubs at Deeside and Holyhead which would support the use of locally sourced materials and resources.

Policies of the NWRTP which aim to improve and enhance sustainable transport options (Policies CB1-CB23, PT1-PT10, AT1-AT6, IN1-IN6), as well as policies which aim to enhance accessibility and connectivity of those sustainable transport options (PT11-PT13, and DC1-DC3), are likely to result in a modal shift away from the private car (to active travel and public transport use) resulting in reduced use of fuel cars and therefore a reduction in resource use. Policies DC1-DC3 focus on digital connectivity and therefore contributes to a reduced need to travel, particularly in relation to employment, which would also contribute to reduced consumption of fuel.

Policies which suggest support for infrastructure development (e.g. AT4 – AT6, PF1) would likely require the consumption of materials. However, there is insufficient information at this stage and therefore any impact is uncertain.

Policies PF1 - PF2 support growth at the ports which could result in an increase in HGV movements around the local areas of Holyhead and Mostyn. This would result in increased consumption of raw materials (i.e. fuels). Additionally, Policies RS7 – RS11 would support the transition to cleaner fuels, such as use of EV



through the provisioning of improved EV charging infrastructure across locations. This would also contribute to a reduced use of raw materials (fossil fuel).

## Objective 12: Create an integrated transport system that facilitates efficient and safe movement of both people and freight, contributing to increased economic prosperity in the region

Policies related to enabling changes to travel behaviour (CB1 – CB23) focus on improving public transport services and active travel routes to major employment sites (Deeside Industrial Park, Wrexham Industrial Estate, and Chester Business Park), education and travel destinations. This supports equitable access to employment, education, and training opportunities, particularly benefiting communities in coastal towns that experience higher levels of social deprivation as well as commuters to investment zones. Community led transport initiatives improve the reliance and resilience of the transport network, supporting businesses and workers and encouraging sustainable tourism. Improved sustainable transport connectivity to economic hubs and tourist attractions, encourages regeneration and investment in more deprived and rural areas. Policy initiatives improving sustainable transport connectivity also contribute to improved access between England and North Wales and North and South Wales for employment and tourism, further enhancing economic prosperity.

The policies related to bus, coach and community transport (PT1 – PT10, IN4) focus on improving bus services, facilitating travel by public transport between major areas of employment both in North Wales and adjacent areas of Northern England including Chester and Deeside and focusing on target areas of concerns like the Menai crossings. By fostering connectivity between communities and these employment hubs, the policies seek to provide equitable access to job opportunities, education, and essential services, particularly benefiting people experiencing socioeconomic deprivation and individuals who rely more on public transport modes. Policies include initiatives to design routes and services to meet customer needs, enhancing connectivity and access to opportunities and services.

Policies PT11 – PT15 focus on demand-responsive transport solutions enhancing safety, accessibility and flexibility. The policies support local economies by improving access to workplaces for people without access to a private car and extend tourism geographies accessible by public transport. This can further encourage regeneration and investment in more deprived areas. The integration of low-emission vehicles strengthens the transport network's resilience, mitigating risks from fossil fuel disruptions.


Policies supporting improvements to active travel infrastructure (AT1 – AT14, IN1-IN2) is likely to encourage more sustainable travel (including more public transport uptake) to access educational, training and employment opportunities benefiting long term economic prosperity of the region. AT12 – AT14 support cycle/e-bike hire generating income for these businesses and facilitating active travel to and from city centres among tourist, supporting local economies... Policies IN5-IN6 relate to improvements to P&R and P&S schemes, which would contribute to reduced congestion in urban centres. Whilst lower congestion reduces travel time (and therefore frees up time for more productive work) and may encourage businesses to locate in an area (due to better local amenity), it may have the opposite effect if subsidies are required from the local economy, therefore stifling economic growth<sup>22</sup>. However, it has also been shown that P&R projects are most successful where they are explicitly for providing more parking for economic growth or traffic management reasons, rather than to enhance sustainable mobility<sup>23</sup>. Economic outcomes would therefore depend on the location and intention of the P&R and P&S facilities.

Policies PF1-PF2 support the growth of port developments providing more employment opportunities and contributing to economic growth. This would encourage regeneration and investment in areas around ports of Holyhead, Anglesey and Mostyn, benefitting more deprived communities in the areas. The policies also focus on freight and improve connectivity beyond the ports, further boosting economic development.

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<sup>22</sup> Park and Ride first principles assessment, University of Leeds

<sup>23</sup> Parkhurst, G. & Meek, S. (2014). The effectiveness of park-and-ride as a policy measure for more sustainable mobility. Chapter 9 in Ison, S. & Mulley, C. (Eds) Parking Issues and Policies. Emerald, 185-211.



By supporting the development of hydrogen hubs, PF4 contributes to increased employment opportunities in North Wales. Further, the introduction of freight consolidation centres through PF6 – 7, could create new employment opportunities. A shift to rail freight (PF9) would improve reliance and resilience of the transport network (through improved rail freight reliability, capacity and frequency, and also reducing congestion on the roads) better supporting businesses and workers and encouraging investment in the region.

## 4 How opinions expressed in response to the consultation on the draft NWRTP and IWBA report have been taken into account

### 4.1 Overview

As outlined in earlier sections, the draft NWRTP and accompanying IWBA report was published for consultation between 20<sup>th</sup> January 2025 and 14<sup>th</sup> April 2025. The IWBA report has been revised, taking into account responses received to the consultation, and will be published alongside the final NWRTP and this Post Adoption Statement (PAS) for the IWBA, subject to Welsh Government approval.

A detailed summary of the responses received to the consultation on the IWBA report is in Appendix A.1 and A.2. This sets out each response received, summarises the comments and sets out actions undertaken to address the comments. A summary of the comments received to the specific IWBA questions asked, and the actions undertaken are set below in Section 4.2.

The separate Consultation Report provides a broader account of the consultation process and responses received, also setting out how feedback has informed the finalisation of the NWRTP and associated documents, including the IWBA.

### 4.2 Summary of public consultation

Public consultation was undertaken to help seek feedback on the draft NWRTP and its associated documents including the IWBA. The feedback received on the draft documents as part of the public consultation has been analysed, reviewed and considered, to help ensure the RTP took comments into account. NWRTP Consultation Report provides the details of the public consultation carried out as part of the preparation of the NWRTP.

Majority of the respondents supported or were neutral about the approach to the draft IWBA. When asked about *“To what extent do you support the approach we have taken to our draft Integrated Well-being Appraisal?”*, 193 participants provided their views on this question. 48% selected that they either agreed or strongly agreed, 33% said they were neutral. 19% selected that they either disagreed or strongly disagreed. Additionally, when asked about *“Please tell us what you think about our draft IWBA or make alternative suggestions”*, 66 participants provided their response to this question. In summary, those that disagreed or strongly disagreed provided comments about the potential impacts of the NWRTP.

There was some concern expressed among respondents regarding the vulnerability of the North Wales coastal road and rail corridor to climate change. While the CJC and local authorities do not have direct control over the strategic road or rail networks, the RTP outlines regional aspirations for these networks due to their importance in supporting connectivity across North Wales. Moreover, the IWBA addresses climate factors in Section 9 of Appendix B and includes Objective 8: *“Support a transition toward a transport sector with reduced (including zero) carbon emissions and enhance the resilience of transport infrastructure to withstand the effects of climate change”*.



Some respondents felt the IWBA did not sufficiently demonstrate how benefits were designed in or harmful impacts designed out, particularly in relation to climate and nature damage. They suggested it would be helpful to see the predicted scale of impact, such as estimated carbon emissions. Others noted a lack of emphasis on decarbonisation and climate resilience within cross-cutting themes. Biodiversity is also considered in the IWBA, with baseline context provided in Appendix B, Section 4. Objective 4 focuses on: *“Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites, species and habitats”* and Appendix C addresses the Habitats Regulations.

Alongside public responses to the consultation, organisational responses were also received as listed and considered in the Consultation Report. This includes NRW, who were notified and sent copies of the consultation documents in accordance with the SEA regulations. The same occurred for Cadw, who did not provide further comments at this stage.

NRW suggested that promoting awareness of the Public Health Wales North Wales Healthy Travel Charter within the RTP could encourage more organisations to adopt its commitments, thereby supporting active travel for staff and clients. This aligns with RTP Policy CB14, which advocates for meaningful marketing and communications campaigns to promote sustainable travel. Regional initiatives supporting this include encouraging public, private, and third sector organisations to sign the Charter and commit to actions that promote healthy travel.

NRW raised comments about flood risk management and transport-related flood risks, referencing the 2015 A55 flooding and coastal erosion. They recommended reviewing relevant NRW plans. In response, the IWBA baseline has been updated to include a section on coastal erosion, referencing the West of Wales Coastal Group and the Northwest England and North Wales Coastal Group’s Shoreline Management Plan.

## 5 The reasons for choosing the NWRTP, as adopted, in light of the other reasonable alternatives considered

The NWRTP has been prepared in accordance with the statutory requirements set out under the Local Government and Elections (Wales) Act 2021 and the associated Corporate Joint Committee (CJC) Regulations. These regulations place a legal duty on the North Wales CJC to produce a Regional Transport Plan<sup>24</sup> that aligns with the national transport strategy, Llwybr Newydd: the Wales Transport Strategy 2021<sup>25</sup>, and contributes to the delivery of its long-term vision for 5 years.


Given this statutory obligation, a “do nothing” scenario was not considered a reasonable alternative. The requirement to produce a Regional Transport Plan is mandatory and, as such, the focus of the IWBA has been on shaping and refining the content of the Plan rather than evaluating fundamentally different strategic options.

The draft NWRTP, including its proposed policies and interventions, was subject to a comprehensive IWBA, which incorporated the SEA process. This appraisal, alongside extensive public and stakeholder consultation has informed the development of the final Plan. Feedback received during the consultation period has been considered in refining the Plan’s priorities and ensuring alignment with regional needs and sustainability objectives.

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<sup>24</sup> CJs also have responsibility for the preparation of Strategic Development Plans

<sup>25</sup> Llwybr Newydd: the Wales transport strategy 2021 – Available online at: <https://www.gov.wales/llwybr-newydd-wales-transport-strategy-2021>



## 6 The measures that are to be taken to monitor the significant environmental and wellbeing effects of the implementation of the NW RTP

Through the IWBA, no significant environmental effects have been identified.

The Guidance to Corporate Joint Committees on Regional Transport Plans<sup>26</sup> outlines that the NW RTP and its IWBA should be supported by a Monitoring and Evaluation Plan, which should consider the measures in the Wales Transport Strategy (WTS) Monitoring Framework, including modal shift and decarbonisation targets.

The NW RTP Monitoring and Evaluation Plan seeks to help demonstrate regional progress in achieving the national priorities and ambitions set out in the WTS. It details how the success of the NW RTP will be monitored, measured, and evaluated, considering the objectives set for transport and associated well-being outcomes. This will help to show the region's contribution to national decarbonisation and modal shift targets.

The Monitoring and Evaluation Plan includes a set of measures based on the WTS Monitoring Framework, adapted to the NW RTP's (SMART) objectives and IWBA objectives. Each measure, designed from the IWBA Framework, is provided with baseline information and, where appropriate, sets targets for improvements over the Plan period up to 2030. For example, the plan aims to enable 30% or more of people in North Wales to work remotely by 2030, to support the national mode share target of 45% of journeys by walking, cycling, and public transport by 2040, to ensure at least 50% of motor vehicles and all public buses in North Wales are zero emission by 2035, and to increase the range of travel within 1 hour by public transport for at least 50% of households in North Wales by 2030, supporting access to key employment sites and regional centres.

The monitoring and evaluation measures also address the well-being objectives outlined in the Integrated Well-being Appraisal. These measures draw on the WTS Monitoring Framework and published baseline data from the Welsh Government and Transport for Wales. For example, to ensure that at least 50% of motor vehicles and all public buses in North Wales are zero emission by 2035, the monitoring and evaluation plan includes measures such as fleet composition (share of each mode by engine type). These measures are aligned with IWBA objectives 8 (supporting a transition toward a transport sector with reduced, including zero, carbon emissions and enhancing the resilience of transport infrastructure to withstand the effects of climate change), 9 (protecting and enhancing local air quality), 10 (reducing disturbance from transport-related noise and vibration to local communities), and 12 (creating an integrated transport system that facilitates the efficient and safe movement of both people and freight, contributing to increased economic prosperity in the region).

Quarterly North Wales committee meetings will provide progress updates from local authority transport officers on the implementation of the Regional Transport Plan (including IWBA) and the Regional Transport Delivery Plan. These meetings will also consider any changing drivers for change and priorities, such as new strategic developments or unforeseen funding opportunities.

For more detailed information, please refer to the detailed Monitoring and Evaluation Plan that is submitted alongside the NW RTP, its Delivery Plan and IWBA.

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<sup>26</sup> Regional transport plans: guidance for Corporate Joint Committee. Available online at <https://www.gov.wales/regional-transport-plans-guidance-corporate-joint-committees>





## Appendices

# 1. Summary of the IWBA-related Consultation Responses and Action Taken

Theme of responses	Comment description	Response/ Action Taken
Well-being	Some respondents express differing opinions with regards to the draft Integrated Well-being Appraisal (IWBA). While some responses consider the IWBA to be robust and cite measures are practical and adaptable to achieve the objectives, others consider that following the Covid pandemic some people do not want their health and well-being choices dictated to them whilst highlighting that well-being goals differ between people. Some respondents suggest that well-being should be the basis for a transport policy in order to highlight the health benefits of using public transport. Some respondents question if the IWBA could further look at the reasons why people with certain protected characteristics may be more or less likely to pick certain forms of transport. Some respondents consider the IWBA to consider the correct questions from the point of view of how the programme or projects will benefit communities, environment, places and economy, culture and the Welsh language and the positive and negative effects in this context.	The Integrated Well-being Appraisal shows how our plans will contribute to well-being, supported by the impact assessments we have undertaken to consider issues such as health, equality, and biodiversity. It has been updated to address comments from Natural Resources Wales and other stakeholders, for example with more baseline information.
	Some respondents highlight concern for the vulnerability of the road/rail corridor along the North Wales coast to climate change.	The Corporate Joint Committee and local authorities in North Wales have no direct influence over the strategic road network or rail network. However, the Regional Transport Plan sets out regional aspirations for strategic roads and the rail network as these are key to supporting our wider connectivity aspirations for North Wales. The Integrated Well-being Appraisal considers Climate Factors (its section 9), and climate change is captured in IWBA Objective 8 (Support a transition toward a transport sector with reduced (including zero) carbon emissions and enhance the resilience of transport infrastructure to withstand the effects of climate change).



Theme of responses	Comment description	Response/ Action Taken
	Some respondents provide a wide range of evidence and statistics about transport and the needs of blind and partially sighted people.	The rail ambitions in the plan have been updated to stress the importance of stations for all, considering the needs of blind and partially sighted people. Appendix B Baseline has been updated.
	Some respondents suggest that the IWBA has not led to the designing in of benefits whilst designing out any potentially harmful impacts in relation to climate and nature, considering it would be useful to see the scale of impact of various policies and objectives i.e. what the predicted impact in terms of carbon is. Some respondents consider there to be insufficient acknowledgement and incorporation of carbon emissions, climate resilience, nature damage or improvement with cross-cutting themes not including decarbonisation or climate resilience and think they should.	<p>The Integrated Well-being Appraisal considers Climate Factors (baseline context is found at Appendix B section 9), and climate change is captured in IWBA Objective 8 (Support a transition toward a transport sector with reduced (including zero) carbon emissions and enhance the resilience of transport infrastructure to withstand the effects of climate change).</p> <p>The Integrated Well-being Appraisal considers Biodiversity (baseline context is found at Appendix B section 4), and biodiversity is captured in IWBA Objective 4 (Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites, species and habitats). Appendix C considers the Habitats Regulations.</p>
	Some consider that while the appraisal considers the well-being of users, it does not adequately assess any detrimental knock-on effects to local communities that might be impacted by road infrastructure development.	The Integrated Well-being Appraisal considers the Regional Transport Plan policies, including for roads, streets and parking. The Corporate Joint Committee and local authorities in North Wales have no direct influence over the strategic road network. However, the Regional Transport Plan sets out regional aspirations for strategic roads as this is key to supporting our wider connectivity aspirations for North Wales.

## 2. Summary of the NRW Consultation Response and Action Taken

Organisation/ Individual Responding	Comment description	Response/ Action Taken
Public Health Wales North Wales Healthy Travel Charter	Raising awareness within the Regional Transport Plan to the Public Health Wales North Wales Healthy Travel Charter would encourage organisations to sign up to the commitments within the charter and improve and encourage active travel for staff and clients. Each of the North Wales Public Service Board have subgroups to support this work.	In support of Regional Transport Plan Policy CB14 (Marketing and Communications campaigns will be developed that are meaningful and focus on raising awareness of the benefits of sustainable travel) it is recognised that North Wales wide projects in support of promotional campaign and travel planning programmes include advocating the North Wales Healthy Travel Charter and encouraging public, private, and third sector organisations signing up to commit to work towards actions that contribute to promoting healthy travel for their staff and service users.
Strategic Road Ambitions (Page 38)	In terms of the proposed 3rd crossing across the Menai Straights, Bridge crossing the River Dee, 'Red Route' and A483, NRW will withhold any comments until detailed proposals are presented for statutory planning considerations. However, we will reiterate the requirement that Welsh Government and all public authorities are required to respond appropriately to the Environment (Wales) Act 2016 that places a duty to enhance and resilience of Biodiversity and the duty that Planning Policy Wales states that developments should not cause any significant loss of habitat or population species, locally or nationally and must not provide a net benefit for biodiversity. Schemes are required to also link into Local Biodiversity Action Plans.	The IWBA assessment includes an objective focused on biodiversity, ensuring that policies do not cause any significant loss of habitat or population species. Local Biodiversity Action Plans across North Wales are also referenced in the IWBA. With regard to the Strategic Road Network Aspirations and references to specific improvements, the Regional Transport Plan has been updated to be clearer about the position Ambition North Wales has as part of the Regional Transport Plan and where it seeks support from the Welsh Government and Trunk Road Agent to address transport related problems on trunk roads within and connecting North Wales.



Organisation/ Individual Responding	Comment description	Response/ Action Taken
Flood Risk Management (FRM)	In regard to the section relating to flooding considerations, NRW feels that there is room for the baseline to have more substance. We refer to the transport issues due to the A55 flooding in 2015 (North Wales flood - BBC News) and the draft NWRTP should review the work conducted by consultants on behalf of Welsh Government. The consultation referred to the relevant FRM plans and policies for the plan area as listed in parts 1.1 to 1.5 (pages 64-77 of 503), however the plan will also need to consider coastal erosion. The Shoreline Management Plan's (SMPs) which cover this Transport plan area would be the West of Wales Coastal Group and the North West England and North Wales Coastal Group. Further details can be obtained via our webpages at Natural Resources Wales / Shoreline Management Plans.	IWBA baseline Appendix B has been updated to include a section on coastal erosion, referencing the West of Wales Coastal Group and the Northwest England and North Wales Coastal Group's Shoreline Management Plan.
Appendix B- Baseline (page 122)	Chapter 7 Ground Conditions (soils and geology): 7.2.6 Refers to groundwater flooding. No reference is made to the 12 number Internal drainage Districts in the plan area which are susceptible to ground water flooding. See- Natural Resources Wales / Apply for land drainage consent.	IWBA baseline Appendix B has been updated to include a section on Internal Drainage Districts in North Wales, including the 12 areas susceptible to ground water flooding.





Organisation/ Individual Responding	Comment description	Response/ Action Taken
Appendix B- Baseline (page 122)	Chapter 8 Water Environment: There is only one paragraph relating to flooding (p.179/503) which is concerning. Whilst it advises of flooding from all sources, flood risk from the sea is not mentioned. Figure 8-3 would appear to have the incorrect description and should be labelled Flood Zone 2 and 3 from Rivers. It may also be appropriate to include another figure(s) showing Flood 2 and 3 for Sea along with a description of the data source and state that the figures show current day flood risk i.e. Flood Risk Assessment Wales (FRAW) maps. Should Climate change maps be used, then the Flood Map for Planning map would be appropriate. The FRAW maps also show other layers such as risk from surface water and small watercourses/reservoirs etc. Natural Resources Wales / Check your flood risk on a map (Flood Risk Assessment Wales Map) / Natural Resources Wales / Flood map for planning / development advice map.	IWBA Figure 8-3 has been updated and labelled Flood Zone 2 and 3 from Rivers. An additional figure has been added show Flood Zone 2 and 3 from Sea.



Organisation/ Individual Responding	Comment description	Response/ Action Taken
Access	<p>NRW agrees that when planning for new developments good transport hubs and connections needs to be considered. This is to make it easier for people to travel without the reliance on a car and connects people with crucial services. This should be a high priority for Local Authorities when considering new developments.</p> <p>NRW has raised access issues in previous Local Authorities consultations to highlight the lack of access arrangements in rural towns and villages. These areas despite having a significant Public Rights of Way network which may be accessible during daylight hours. For six month of the year through Autumn to Spring access is limited to very short lit sections. This limits safe access for all in these areas.</p> <p>Regarding impact to protected sites, local authorities will have to undertake the assessments of their plans and projects for potential impacts (Habitat Regulation Assessments) on Special Areas of Conservation and Special Protection Areas and would have to ensure they comply with the Wildlife and countryside Act 1981.</p> <p>We note that transport and access are major issues affecting some communities across North Wales, due to increased visitor numbers following covid. The Gwynedd and Môn Public Service Board has a subgroup piloting looking at different approaches at Niwbwrch where useful learning will be available for other areas and communities. This should be an Ynys Môn wide approach involving improved active travel and where that alternative is available.</p>	<p>Ensuring access to good transport in rural towns and villages, particularly with regarding to lighting along PRow is considered in the IWBA assessment.</p> <p>Ambition North Wales will continue to engage with North Wales Local Authorities, including Gwynedd and Ynys Mon to help share learning and best practice.</p>



Organisation/ Individual Responding	Comment description	Response/ Action Taken
	<p>In its Programme for Government (2021-2026) Welsh Government set out its commitment to designate a new National Park for Wales. As the designating authority for any new National Parks and National Landscapes in Wales NRW has been assessing the case for a new National Park within North East Wales. NRW ran a 10-week public consultation period between 7 October 2024 and 16 December 2024 on a Candidate Area (draft boundary) for a National Park. The consultation generated significant levels of response and NRW have commissioned Resources for Change to undertake a detailed analysis of the response to the consultation. The Public Consultation Report will be published in April 2025, we will arrange to forward a copy when available. The interface between an anticipated increase in visitor numbers, implications for the transport network and related infrastructure and the need for careful management to avoid impact on communities and the natural environment emerged as a key theme. There were several related elements to the response including: An anticipated increase in the volume of traffic along the major highways providing access to the Candidate Area; Implications for the road network within the Candidate Area; Impact on, and availability of related infrastructure such as car parking; The importance of public transport and access for the less able; Maintenance of the public footpath network across Candidate Area and the need to better manage inappropriate behaviour.</p> <p>The emerging Regional Transport Plan provides a strategic framework to help proactively plan for, and manage, the pressures and opportunities arising out of a new National Park. We would be happy to meet to discuss and elaborate on the issues outlined above.</p>	<p>Issues of traffic from visitors, car parking, road network and safety conditions as well as accessible public transport and active travel routes are addressed in the IWBA.</p> <p>In considering Regional Transport Plan Policy CB15 (Work with partners and stakeholders in the tourist sector to investigate methods for encouraging visitors to North Wales to travel sustainably whilst also enhancing the visitor experience and boosting the visitor economy), the plan sets out whilst we need to protect and enhance our natural beauty spots such as the Llŷn Peninsula, and the Clwydian Range &amp; Dee Valley (which is being considered as a new National Park) it is vital that our transport network supports the continued success and growth of our tourism industry. In considering Policy LU3, the plan sets out in addition to economic centres for growth, our emerging Local Development Plans and the Strategic Development Plan should also consider any further sustainable access needs to the Clwydian Range &amp; Dee Valley should it become a new National Park in the future, recognising our transport network needs to support the continued success and growth of our tourism industry.</p>



Organisation/ Individual Responding	Comment description	Response/ Action Taken
Coach and community transport (page 7)	<p>We would support the opportunities for Park and Ride coach and community interchange that would allow park and ride to and from popular tourist destinations across North Wales for example Bangor train station and also connect to Eryri National Park etc. This facility would be encouraging people to leave their cars either at home or outside the National Park or National Landscape area and use public transport to explore North Wales. It would fit well with the transport and parking review conducted by the Eryri Partnership.</p> <p>Walking and wheeling should be included in efforts to integrate between different modes of travel. The definition of Active Travel within the plan requires to be wider to include traveling for recreation, connecting people with places that they enjoy visiting rather than only making reference to traveling to work or school. These should include links between local public resources such as swimming pools and leisure centres, as well as local places for nature like nature reserves, beaches and forest sites.</p> <p>There should also be considerations to links to main trains and ports and cross border travel to enable better connectivity for active travel over long distance using multiple travel options.</p> <p>Trains should have facilities for bikes that meet the needs of modern-day cyclists such as storage and charging. Current storage facilities on trains for bikes are often poor and dated, and cause friction between user groups.</p> <p>When considering public bus services, it is worth evaluating the North South link. There needs to be greater understanding of how important these transport services are to mobility, access to services and economic activity.</p>	<p>The Regional Transport Plan and IWBA considers the benefits of Park and Ride and community transport options to encourage use of sustainable public transport and reduce use of private vehicles, particularly in national park landscapes. Additionally, the Regional Transport Plan and IWBA also considers the benefits of installing cycle storage and charging facilities as well as accessible public rights of way to encourage active travel modes, to connect to other modes of transport as well.</p>