

Appendix B

National Transport Plan 2015

Consultation Response Form

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Question 1: We have analysed a lot of data in developing the National Transport Plan. Do you feel there are any significant gaps in the data considered?

Yes:

If yes, please explain the reason for your answer:

Whilst reference has been made to acknowledging recommendations of the North East Wales Integrated Transport Taskforce, there is little reference to the significant findings of the report and the baseline data analysed in the production of that report. Of particular importance is Haywood (2013) 'The Dee Region Cross-Border Economy: next steps Report for the Minister of Business, Enterprise, Technology and Science.

The Tables containing the Interventions include a column 'Rationale from the evidence' It would have been useful if these columns referenced the appropriate data set where the evidence derives from.

Question 2: The Plan sets out the key findings from the evidence. Do you consider there are any key findings missing?

Yes:

If yes, please explain the reason for your answer:

Yes. The North East Wales Job Seeker survey, Taith 2013 found that '1 in 5 turn down job interviews or employment offers due to inaccessibility. The findings also reveal that employment locations such as Deeside Enterprise Zone and Wrexham Industrial Estate have job vacancies, but such locations need to be made more accessible to those most in need.

Question 3: Do the interventions address the findings from the evidence base?

No:

If no, please explain the reason for your answer:

Roads

The North East Wales Integrated Transport Task Force report June 2013 states "North Wales is an economy worth approximately £10.4 billion per annum and represents 22% of the economy of Wales as a whole" and "North Wales represents over 30% of the manufacturing output of Wales". It also refers to approximately 32,000 more vehicles using the key cross border roads in North East Wales than the core crossings in South East Wales and refers to the value of the economy (£31 billion output) between Manchester Airport and Anglesey.

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Research from the Mersey Dee Alliance indicates an employment growth of 45-55,000 jobs over the next 20 years in the region. Given the expected growth and the under capacity on the highway network currently providing the main gateway into Wales, more emphasis and priority needs to be placed on the work to define the proposed route of this main artery and once this has been decided, the mechanism to improve the capacity and resilience of the route should be treated as a priority for all North Wales.

Flintshire is extremely well located with regard to road, rail, sea and airport access, probably the major contributory factor in the success of the business economy and manufacturing sector within the County.

The anticipated 5-7,000 job creations associated with the Airfields and Northern gateway developments within Deeside Enterprise Zone will, potentially, "challenge" an already struggling trunk and county road infrastructure in the area around Deeside Industrial Park and Queensferry. Therefore, it is imperative that the anticipated additional traffic is managed in a sympathetic and structured manner.

The success of manufacturing also brings with it an increase in HGV traffic to industrial sites, which in many cases can cause traffic and parking congestion at Industrial sites e.g. the proposed North Wales Residual Waste Treatment Facility at Deeside Industrial Park.

Any failure on this already congested route would therefore have a significant effect on the local network and restrict access to the A55 and the North Wales Trunk Road network, impacting on the regional, national and European economies. Given these statistics it is felt that the Draft National Transport Plan has not sufficiently recognised the importance or timescale for the improvements to this key gateway within the interventions for North Wales

It is also disappointing that no reference is given to alternative solutions i.e. the creation of a possible link from the A548 Dee Crossing to the A55 creating a more suitable and environmentally friendly alternative, despite previous Welsh Government consultations on route options. The A548 Dee Bridge is a wasted asset which if utilised better would enable traffic to be diverted from the existing routes, easing congestion, environmental and maintenance issues on the A494.

Recommendation: Make specific reference to alternative routing for the North Wales gateway i.e. Linking the A548 Dee Crossing to the A55 within the Interventions.

Trunking of A548

The potential trunking of the A548 from Connah's Quay to Mostyn is mentioned in the NTP but the document is unclear as to what 'trunking' would mean. Clarification required on whether it involves significant road improvements as this will have an impact on an intervention in the North Wales Local Transport Plan for the further development for the gaps in the Dee Coastal Walking and cycling path and the duty placed by the Active Travel (Wales) Act.

There is no mention of the potential for an upgraded interchange at Broughton to serve Broughton Retail Park and Airbus. Higher Level Intervention No. 4 of the Joint North Wales Local Transport Plan includes a scheme to improve the existing interchange and walking and cycling linkages giving enhanced access to employment at Broughton Shopping Centre. Considering the economic importance of Broughton, the scale of previously approved development and the impacts of traffic through Broughton this improvement scheme should be recognised in the National Transport Plan.

Recommendation: Include as an intervention as it provides access to the Trunk Road Network.

Shotton Rail Chord

Presently due to freight destined to/from Deeside Industrial Park having to be diverted via Wrexham to access this site, further freight operations are restricted on this path as it is not available for 24 hours per day, seven days per week. The lowest cost solution option is a single curve immediately to the south of Hawarden Bridge and east of Shotton Station would link the Deeside Industrial Park (Deeside Enterprise zone) from Liverpool and the Wirral line via an embankment build out onto existing recreational land at Shotton to join the North Wales Coast main line.

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This would open up a freight path directly through to Chester giving more direct access to the West Coast Main Line replacing the existing inefficient freight path out to Wrexham and through a steep incline that exists between Shotton and Hawarden that is also adverse to certain heavy freight loads.

Shotton Rail Chord would allow freight paths to meet the needs of the whole of North Wales for the foreseeable future. A working example of how the Shotton Rail Chord would benefit the area is; Freight would be able to depart North Wembley and enter the North West coast main line via Crewe and Chester which is the most direct path. Saving both time and fuel compared to the existing freight path via Wrexham.

Recommendation: This scheme should be included as a priority in the Interventions

Question 4: Are the delivery timescales appropriate (Section 3)?

Yes/No:

If yes, please explain the reason for your answer:

Refer to evidence base in Q3.

Rail Infrastructure

The importance of the linkages to the international airports at Manchester and Liverpool and the modernisation of the rail infrastructure are of enormous importance to the visitor economy of North Wales and of Flintshire facilitating visitor access to the region.

Proposed improvements to Rail infrastructure will potentially assist in reducing traffic congestion at busy sites. In addition to rail commuter benefits, the potential opportunity of rail freight activity around industrial hubs could also have a positive impact on HGV and general traffic congestion.

Proposals for new stations is be welcomed, however, given the economic importance of Broughton and Northern Gateway it is disappointing that further clarity is not given in terms of priority and timescale for implementing these schemes. The potential reopening of the Hawarden Bridge Railway Station, offer hope to Deeside Industrial Park employees based between Wrexham and Wirral/Liverpool.

The 'Dee Region Cross-Border Economy' report (2013) recognises the need for connectivity improvements for the Deeside Enterprise zone which is expected to deliver up to 7,000 jobs over the next 20 years.

The Proposed electrification of the North Wales line to Holyhead will potentially reduce travel time for rail commuters across the North Wales coast. The proposed HS2 service could be accessed at Crewe, resulting in reduced travel time from North Wales to London for business commuters. It is disappointing that no greater urgency to achieve this is set out in the document.

As stated within HLOS the Secretary of states review period from 1st April 2014 to March 2019. Electrification of the West Coast Main line would provide the support to the Northern Gateway employment growth, providing the sustainable transport alternative to the planned road expansion.

It would be highly beneficial to see the NTP prioritise the proposed electrification of the North Wales coast Line to Holyhead clearly with any commitment given to the electrification of Chester to Manchester, as otherwise this could cause the possibility of an adverse effect for Flintshire as the neighbouring authority to Chester with significant large commuter traffic journeying by private car on key roads to access the new high speed rail services available from Chester, resulting in an additional strain on the resilience of the local network.

Roads

The plan includes an intervention to 'Develop a scheme for improvements to the

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A494/A55/A548 Deeside Corridor' with a short / medium term priority. This is a strategic gateway into North East (and North West Wales) and is at the heart of a sub regional economy, as recognised in the Wales Spatial Plan and by the recent grant of Enterprise Zone Status. It is therefore disappointing that only further consideration is to be given to a scheme in this key transport corridor, with no timescale indicated as to when such a scheme could be implemented. Further delay in addressing key traffic 'pinch points' that are currently hindering our local network for access to employment opportunities, journey times and the movement of goods to and from key employment sites will impact on the growth in our economy and put additional strain on the resilience of the local network. By accelerating a scheme to address traffic capacity and congestion issues along the A494/A55 will ensure that the development of the Deeside Enterprise zone is not curtailed.

Recommendation: Intervention R24 needs to be of higher priority not only to address current issues but to meet future demand as a result in projected growth in the economy and placed in the short term timescale.

Question 5: With regards to funding the interventions are there any other funding streams we should be considering (Section 4)?

Yes/No:

Active Travel

Several cycling and walking routes have been created or enhanced utilising Rural Development Plan funding. A number of these schemes, particularly those implemented through the 'Linking Flintshire's Communities' scheme have improved connectivity between rural communities and sites of employment and strategic cycling and walking networks. Opportunities to build on this should be explored with the new rural programme and other funding regimes.

Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Economic growth, access to employment and sustainable travel and safety are three key priorities within the framework of the Draft National Travel Plan which directly affect the business communities and economy of Flintshire, and indeed the wider North Wales. The congestion issues facing Deeside have a wider impact than that upon the Deeside Enterprise Zone. There is an integrated package of regeneration underway in Deeside that will capture the economic growth in the area and use it to facilitate wider regeneration, especially for the more deprived communities. This regeneration approach, part funded by the Welsh Government Vibrant and Viable Places programme, will raise the quality of life across Deeside and the current congestion problems in the area are a stumbling block in this process. The commitment to commission further study of this is welcomed, especially if this is linked into the wider regeneration of the area. Deeside has a growing role as an economic driver for the subregion and transport connectivity is a major element in realising this potential for communities across North Wales.

Demographics

Whilst in several rural communities access to public transport is generally poor, access to a car is high in rural Flintshire.

Coastal rural areas such as Gronant, Talacre and Mostyn do however have lower levels of car ownership. So do areas of Mold, Saltney and Sealand.

Whilst high levels of car ownership suggests that accessibility may not be a significant issue for a large proportion of the rural population, there are groups such as the elderly, low income and unemployed that may not have access to a car and may suffer from rural isolation and poor access,

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Access to Employment

The Plan refers to links to Enterprise Zones. Access to the Deeside Enterprise Zone within 60 minutes of public transport is relatively poor in the rural areas, particularly in some of the rural coastal communities e.g. Gronant and Talacre. This is compounded in the rural coastal areas where there is lower access to a car.

Flintshire CC welcomes the Plan's suggestion to review opportunities already identified to improve access between and to/ from Enterprise Zones, and working with others, to identify further opportunities. The Rural Development Plan, particularly the LEADER element, could present opportunities to pilot innovative solutions to ensure that rural communities have the necessary access to capitalise on the business and employment opportunities arising from the EZ.

Flintshire CC welcomes the Plan's suggestion to undertake a feasibility study to investigate options to improve access to employment sites in the Deeside area by sustainable travel modes.

Access to Services

Access to hospitals by public transport is poor in the inland rural communities to the west. However this is offset by a relatively high level of access to a car. Accessibility is less of an issue in the southern rural communities (access to Wrexham Maelor) and those closer to Denbighshire (access to Ysbyty Glan Clwyd, Bodelwyddan). However it is the rural coastal communities that suffer both from poor access to public transport and low access to a car.

Access to further and higher education facilities by public transport is poor in some pockets of the rural areas particularly some coastal villages and rural settlements to the west but again access to a car counteracts this.

Access to key tourist sites by public transport is poor in in-land rural communities (along the Clwydian Range) however access to a car is generally good.

The plan recommends improving access to the public transport network to access employment and services and the need to focus on improving connectivity and accessibility between communities and key employment centres – particularly where both access is low and car ownership is low. In rural Flintshire poor access to public transport is generally mitigated by good access to a car. However this should not disguise the fact that there are some groups of the rural population that do not benefit from access to a car and the Plan needs to recognise this.

Bus and Community Transport

The Plan recognises the significant contribution that community and voluntary transport schemes make in addressing accessibility difficulties. Flintshire CC supports the commitment in the plan to continue funding these schemes and supports the priorities to achieve this. In rural Flintshire, several community and voluntary transport schemes have been implemented, with a varying degree of success. Projects failed where the perceived need and demand was much greater than the actual position and the interest and take up of these initiatives was lower than anticipated. Future schemes should be developed on the basis of sound evidence and a proven need and a 'one size fits all' approach is not always appropriate for both urban and rural communities.

The plan specifies the need for enhanced connectivity for communities, business and key services, but there is no indication of how this can be achieved.

The plan mentions development of options for targeted funding for bus and community transport focussing on: rural services, access to employment and access to hospitals and other key services. The plan has recognised the importance of targeting funding on areas where car ownership is low and in areas of deprivation. Recommend this is a priority area for funding.

The NTP states it will continue to provide a concessionary fares scheme for older people, disabled people and seriously injured service personnel and veterans. The NTP should take into consideration the findings of a consultation carried out with service users in 2013/2014

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through bus users' surgeries by FCC. The vast majority of over 60 concessionary pass holders indicated that they would be prepared to either pay for their passes (i.e. one-off fee) or pay a small fee for their journeys (e.g. flat rate single fare).

It would be beneficial also if the NTP considers a review of the eligibility criteria or conditions of pass usage, i.e. increase the eligibility age to 65 in line with retirement age / limit usage to off peak times during the daytime as in England). Additionally consideration should be given to extending the age limit of the Youth Concessionary Fare Scheme for 16 and 17 year olds to include 18 year olds.

The NTP refers to the implementation of greater central management of TrawsCymru long distance bus services, however there is no mention as to whether any new services, enhanced services or taking over any existing routes.

Support the Intervention BC T7 the production of an All Wales Bus Quality Standards for bus and community transport services in partnership with Local Authorities, operators and users.

Support the Plans proposal to play a more prominent role in the planning and delivery of longer distance bus services across Wales through Quality Bus Partnership Schemes

Support the Plans value of Community Transport services in terms of providing affordable and accessible transport for more socially or geographically isolated people

Sustainable Transport Initiatives

Greater emphasis is now being placed on sustainable transport initiatives through carbon footprint, healthier lifestyles and traffic management reasons.

Unfortunately, the popular Shuttle Bus service into Deeside Industrial Park is currently under threat which will potentially create barriers to accessing employment for those employees on lower pay or without transport and who have previously relied upon the service.

The draft strategy makes a passing reference to Communities First but fails to recognise the significance of the links between transport and tackling poverty. A fuller assessment of transport barriers, particularly to areas of employment and learning, facing the residents of Communities First areas is recommended.

Consultation on the Joint North Wales Local Transport Plan

Flintshire County Council received a number of responses from Flintshire residents on the Draft Joint North Wales Local Transport Plan. Specific issues regarding the congestion on the A494 were raised and are provided as bullet points below:

- Vehicle emissions/particle matter at 2.5 is dangerous and puts a risk to residents health, particularly at the Ewloe Interchange
- The traffic noise, high speeds and pollution make it difficult for residents to enjoy their properties
- The Air Quality monitor was removed and never replaced
- Objection to the expansion of the A494
- There is a need for signage on the M6 at J15 to encourage use of the A55 and to encourage use of the Flintshire Bridge
- Link Flintshire Bridge to the A55 to simplify the route from the M56/ Deeside Industrial Estate to Holyhead for freight transport to relieve congestion on the A494 Ewloe Interchange
- Consider improving the link between the A541 between Mold and Wrexham as it links the A494 to the A483 Trunk Road
- Consider improvements improving access to other Trunk Roads in the area i.e A483 Chester to Swansea via Wrexham

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Equal Opportunities Monitoring Form

The Welsh Government is committed to achieving equal opportunities in all its activities and responsibilities. This means taking action to ensure that all our services are accessible, and that all users of our services are treated equally.

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The information you give us will be treated in confidence and will be used by our Team to provide statistics for equal opportunities monitoring to assess how our policies are put into practice.

We will keep this document separate from the Consultation Questions Form. We will treat the information you give in strictest confidence.

The Welsh Government carries out equal opportunities monitoring to collect information which will allow us to improve our services.

1. What is your sex?

Male

Female

**2. Can you understand, speak, read or write Welsh?
Tick all that apply**

Understand Welsh
Speak Welsh

Read Welsh
Write Welsh

3. Disability

Do you consider yourself disabled?
Do you have a work limiting health condition?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

4. What is your ethnic group?

- a. White
- b. Mixed/Multiple ethnic groups
- c. Asian/Asian British
- d. Black/African/Caribbean/Black British
- e. Other ethnic groups

5. What is your age?

Please specify

0 – 15 years
25 – 44 years

16 – 24 years
45 – 64 years

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65 – 74 years

75 + years

Thank you for completing this form
