Appendix C

### National Transport Plan 2015

#### **Consultation Response Form**

Your Name: Ann Elias on behalf of Councillor David Smith Chairman of the Taith Board

Organisation Name (if applicable): North Wales Transport

Email / telephone number:

Your Address: Gwynedd Council

**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: Objectives/priorities-

# The plan needs to clearly set out what the Issues/Opportunities/Outcomes are intended to be by delivering the interventions and support this with data reference.

**1.3.4** By reducing the 17 outcomes from the Wales Transport Strategy down to 5 headings, there are important consideration relating to "connectivity"; access across all of Wales and Internationally that are missing. Identify the need to have sustainable transport Freight and Visitors are also important; There is also the need to reduce CO2 and adapt to the impacts of "climate change" all of which could also provide opportunities that will contribute to growing the economy and are important when taking forward improvements to the transport provision in Wales. Especially when 1.4.15 states that "the NTP contains interventions aimed at improving connectively" 1.4.23 – The Children's Rights identified not only affecting "connectivity" but also leisure and recreational journeys which our Visitors can also benefit from.

The use of an objective of economic growth can be achieved by delivering transport interventions that provides for access to employment or access to services which supports economic growth.

The North Wales Joint Local Transport Plan refers to the "Mid and North Wales 2011 Journey to Work Analysis AECOM 2014" report a piece of work undertaken as part of the North Wales Ministerial Task Force this work should be identified.

There is no regional dimension to the plan the use of the short summary of regional finding, is just a set of headline facts which do not just affect the region but are also national issues.

There is no rail demand forecasts from the emerging Wales Route Strategy North Wales Coast-Chester 12% by 2023 and 41% by 2043

The use of the factual data isn't explained as to why it is relevant to the proposed intervention.

The plan would flow better if national interventions were identified and then separate sections for regional priorities and interventions.

The Data collection should form an update of the National Transport Strategy in order to inform the NTP and this would allow for a shorter plan.

The role of spatial and land use planning and its association with transport planning is underplayed within the plan, when it should have a major consideration and be assessment as it they identify as a first priority to grow the economy and in order to do this they recognise the need for a spatially-

specific focus and highlights the Enterprise Zones.

**2.4.2**. This relating to the average distance travelled to work of 16.7km and identifies Anglesey as being higher (22.5km) and the number of people having access to work place zones being as low as 16% in Denbighshire. What is lacking is the recognition of the accumulated factors, of living in remote rural communities and reduced opportunities of employment reduced public transport which necessitates the need to travel further distances, or reduced employment, hence the need to identify regional differences.

**Figure 2:12** identifies average daily HGV & LGV Flows there is no recognition that the numbers of lorries on the north Wales Road network at Queensferry A494, A55 & A483 are equal if not higher to the rates identified for the M4.

**Figure 2.13** shows the Road Traffic Collision Rates but there is no forward Trunk Road programme within the plan to identify prioritisation for reduction by undertaking road improvements.

Cross boarder issues. There needs to be identification of cross boarder movement for employment, access to services especially health and education.

**Page 32** – There needs to be Active Travel Data to support the changes in numbers cycling and/or walking.

**Page 33 Rail** - There is no mention of retention of railway infrastructure and the desire to review with options for reopening lines e.g. Bangor and Carnarvon Railway; Anglesey Central Railway (Gaerwen to Amlwch)

**2.6.34** refers to Figure 2.19 being evidence of fare paying passengers when the graph refers to all bus passengers! Where are the figures to support the concessionary fares identified at (2.6.35)

**Page 34 Bus** - There is no indication as to why bus user numbers have declined, there needs to be recognition that reduced subsidy means higher fares or reduced services. It is more expensive to run rural services because of distance.

**2.6.40** mentions Anglesey airport but does not provide data for the Anglesey and Cardiff service funded by the Welsh Government!

Figure 2.20 & 2.21 There is no reference as to why these plans are being used.

**Figure 2.22** Journey speeds. There is no Trunk Road route program to identify how this data affects the decision on prioritization.

**Figure 2.28** needs to identify on a map by each hospital location and it should be daily flow to understand if they contribute to the congestion times. There needs to be research work to identifying why or if public transport is a requirement to access hospitals and whether by either relocating services to a different location or changing start times could also evoke change.

There is no mention of Canals in Wales. The Llangollen Canal.

**Page 65** Climate Change – The figures identified are for England and Wales there needs to be Welsh only figures.

**Page 140** Health there is no mention of the Non-Emergency Transport Project Board set up been the Welsh Government!

**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:

**Page 73/74** - Where the plan has split key findings into regions, these are not necessary unique to these regions alone and are for example an all Wales issue such access to work, high education, and services, resilience of the road and rail corridors to planned and unplanned events, reducing journey times; capacity constraints and congestion.

There appears to be a section of the plan missing. There needs to be a flow diagram which shows how the data/issues forms the outcomes and then how the outcomes will be delivered by the Higher level interventions (As required for the Local Transport Plans)

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

# No:

# If no, please explain the reason for your answer:

**3.1.3** - Local authorities have had a long history of working with the Welsh Government to deliver transport improvements as they are often best placed to understand the local needs and negotiate solutions. However, with the current situation of wishing to engage with all 22 local authorities individually is proving very resource intensive and an opportunity to re-engage with the government at a regional level would be welcomed in order to find a more cost effective way to resource time and energy required to have whole Wales solutions.

About three-quarters of the funding available to undertake this responsibility for Local Authorities comes from the Welsh Government 95% of the network is within this responsibility. The gap is getting wider between backlog of repairs and the amount of allocated funding; this situation needs to be addressed if Local Authorities are going reduce the gap. Over a three period LGBI was made available to Local Authorities to undertake either infrastructure improvements or replacement surfacing. A continuation of this programme would provide an opportunity for Local Authorities to reduce the backlog further.

**3.2.15 Intelligent Transport Systems** – Working with the LA's to put electronic signage at key junctions will further strengthen the Network management across the region.

**3.2.15 Reduce our energy consumption such as low energy lighting** – This is an aspiration for LA's and with the WG supporting projects of this nature in the region will assist the WG in reducing Co2 emission targets.

**3.2.18** - allowing speedy and reliable movement of goods and products and access to a labour force. Delays on the network and unreliability in journey times, affects productivity and reduces access to markets. – Between the Trunk Road network lays a network of County Roads that contribute to an efficient and effective network. Without sustained long term commitment to providing funding to support the County network as well as the trunk road network will mean that goods; products and access to a labour force will experience reduced unreliable journey times. Over the last 5 years the Local Authorities have not only seen their settlement payments from the Welsh Government reduce but also the Capital Transport Grants reduce from over £100m 2008/09 down to £15m 2014/15. To invest in the County Road network not only contributes to the economy through construction but also provides confidence in the network to felicitate connectivity between places to stimulate the increased movement of goods and services, especially when traffic volume is forecast to grow by 33% by 2040.

**Page 85 – R4 Deliver a programme of road safety improvements outside schools on the Trunk Road** – In order for the Road Safety Framework for Wales to achieve its priorities it is important to also work with Local Authorities to deliver a programme of road safety improvements outside schools on County Roads as well.

**Page 96- AT1** – Active Travel is a new duty placed upon local authorities to map existing routes and then consider and integrated network in order to undertake this new duty funding is require to deliver a meaningful network.

**Page 97 Rails - para 3.8.3** - There should be a mention of electrification of the North Wales Coast line as part of a medium term modernisation business plan. No mention of rolling stock and how this will fit with the new rail franchise, or indeed the future rail franchise model of not-for-profit company being established and the benefits this will bring to Wales.

**Page 98 para 3.8.7** - The identification of the seeking to persuade the UK Government or Network Rail to invest in the rail network in Wales should also include both involvement with and contribute towards projects affecting North Wales to achieved your identified outcomes, to achieved growth.

Page 100 RI1 Chirk Station is completed. New locations need to be identified for improvements to be undertaken.

# What stage is Rhyl at?

**Page 103 - Intervention RI6** - This intervention refers only to North/South journey improvement times, which is a lower priority for North Wales. A further Intervention should be added to Improve North Wales/North West Journey times funded through the Welsh Government.

### **Page 105 develop new Railway stations** – Is anything missing?

**Page 106 Intervention RI12** North Wales electrification is of such importance that it should be an intervention in its' own right.

**page 107 paras 3.10.4 & para 3.10.5** The NWEAB must have an input to the specification of the next Wales & Borders franchise so far as it affects services in North Wales. The Board will also request that it has a monitoring role in the award of the next franchise. The next franchise may not necessarily have the same scope as the current franchise but at this early stage it is paramount that the current through services to the North West, London, the Midlands, and South Wales are retained without the need to change at Chester.

**Page 109 Intervention RS2** The NWEAB (or other combined 6 County Body) should have formal input to the WG over identifying appropriate service frequencies and any additional services.

Buses.

# Page 109 3.12.1 We want to see more services operating commercially and to see the proportion of fare paying passenger's increase as a whole.

Within the rural context it is extremely unlikely that any service could be entirely commercial as they will received some form of public funding either via concessionary fares reimbursement and BSSG. Therefore a redefining of the term 'commercial service' to either partly supported or wholly supported may be an achievable outcome.

Because of the rural nature of large parts of Wales it is more expensive to provide bus services in these parts of Wales, due to sparsely populated areas, long distances, access services and the general topography of the areas, therefore public funding is required to operate them. The current funding formula's used to allocate Welsh Government funding disadvantage rural areas wherefore the need to support services in rural areas is greater.

There needs to be a move away from simply giving it to bus companies because they operate a bus service! What is required is funding based upon delivery of added value to the services

# Appendix C

- Such as rural dispersal, urban / rural deprivation / number of available services (higher number of services achieves a lower score). A 'statutory body' is required that either sits in or acts on behalf of WG that "manages" the provision of nationally and regionally strategic bus services, and sets about "mini-output achievements" for those services that fall 'outside' of those routes (which are more likely to be the traditional commercial bus services). It would require some form of "Reshaping the Welsh Bus Network" to achieve a more sustainable bus service for Wales. There is not a "one size fits all" approach to providing bus services, but rather there should be a mosaic approach that could be achieved via re-regulation / franchise /rural subsidy.

# Page 114 BCT5

# the recommendations of the Bus Policy Advisory Group review 2014

- Stability is important (but in an unregulated environment impossible to enforce),
- Consistent pan Wales approach to policy is supported but a statutory body is required to assess and monitor compliance.
- Network Partnerships –
- Kick Start Funding new pilot projects or extension of phases should be assess and monitored and out puts agreed by Statutory body.
- Investment in Infrastructure Good quality infrastructure is required to support good quality bus services.
- A Fair Fare again this needs to be securitise and assessed via statutory body.
- Information absolutely key to providing a successful bus network, however, it needs to standardised and linked to rail services and then promoted.
- Welsh Bus Standard need to introduced in a balanced way because the more that is require to be delivered the higher the service costs.
- Integration of services is vital but it must include cross boundaries and rail services
- Driver CPC Disable module is supported however the training needs to be standardised.

**Page 116 BCT13 – Work with CT transport providers to develop car club schemes in areas** This should be a whole service project and should not be exclusive to CT providers.

**Page 117 BCT14 Develop a package of bus priority measures along key strategic corridors.** This should be work with local authorities to identify a package of bus priority measures along key strategic corridors. This should be a partnership approach in order to ensure continuity of approach for corridors and identify additionality that could be achieved.

**Page 118 3.16.1** The Welsh Government supports Traveline Cymru and is the Welsh Governments supported tool to access information for travel choices. We the advancement to other travel tools available via the internet a review of the services should be undertaken to identify if this is still the most effective way of sharing travel information. Currently the system does not deliver the full travel options or prices to the user.

**Page 120 ITC 1** If the Travel planning arrangements are to be reviewed this should be in partnership with the Local Authorities who host these posts and allow them access to other Council services and support to ensure the right messages are consistence to the public.

**TIC2** Delivery of personalised travel planning should be to work with Local Authorities.

**Page 130 3.23.9** identifies the Welsh Governments desire to achieve a number of objectives for the "Metro" it is disappointing that these objectives are not Wales wide.

Page 144 Delivery and funding.

Since the breakup of the transport consortia's across Wales there has been disjointed approach to sharing information and aliening practices. There is now a number of board/groups/advisory teams/taskforce which is setup to evaluate and make recommendations on behalf of local authorities however, there membership has no political mandate a no method of sharing the lessons learnt. Having such ad hoc approach is not a cost effective way for the Welsh Government to seek consistent advice and consider the best options for delivery.

Page 150 4.3.7 Active Travel interventions will be also taken forward as part of broader tourism and Enterprise Zone projects - Active Travel identified locations do not all fall within areas that will connect to the current Enterprise Zones. We do not understand the relevance of this section?

**Page 152 – 5.2 Monitoring and Evaluation Plan.** – Monitoring is a resource constrained and is subject to many external influences and time scales and limited by budgets available and should therefore be appropriate to the value of the project and a recognition that results are not instant and often rely on adequate revenue being made available to promote intervention for it to achieved its full potential to achieve change.

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

Yes/No:

If yes, please explain the reason for your answer:

Most of the north Wales interventions are short term do you have any issues?

It would be helpful to provide annual delivery plans and programmes and APR for the NTP.

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

### Yes/No:

Page 147 " when providing grant funding for capital projects, the project sponsor should be required to provide match-funding to incentivise effective delivery and value for money. In addition, we should only make capped offers and should not underwrite over-spends" With the current challenges that Local Authorities face with reducing budget allocations from the Welsh Government providing match-funding to support large infrastructure projects has become increasingly difficult and in many cases this may now prove insurmountable to some schemes. This will now be further compounded by the insistence that funding offers are capped with assurances that over-spends can be met.

The risks to delivery will become such that the overall costs of the schemes will now rise to ensure their delivery. Whilst is understood that projects should be properly managed it is however, impossible to always account for the unknown elements of construction and Local Authorities will now need to work with the Welsh Government to broker agreements that would seek a sharing of the risk between funding partners.

Page 148 4.3.4 The interventions set out in this National Transport Plan will be delivered by drawing on a number of funding sources: Local government or other public sector bodies, including joint funding where the intervention delivers multiple objectives. Depending upon Local Authorities to provide joint funding to achieve the Welsh Governments Transport plan outcomes, will prove extremely problematic over the coming years, owing to the current spending cuts currently required.

Enabling local government borrowing to allow projects to progress - Local Authorities welcome the

opportunity to continue the successful Welsh Governments "LGBI" which allow the progression of Capital infrastructure improvements as well as, improvements to road surface.

**Page 149 4.3.6 Projects identified to be delivered for European Structural funding.** – It is disappointing not to see project that will allow Local Authorities the opportunity to deliver infrastructure under this programme.

**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.

Where projects are short term there needs to be evidence of transport appraisals as appendices, The scoring of interventions against the Welsh Transport Strategy against the outcomes would be helpful.

A summary of responses to this consultation would be helpful.

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:

Appendix C

# **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.

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	e

Female

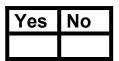
2. Can you understand, speak, read or write Welsh? Tick all that apply

Understand Welsh Speak Welsh

<b>Read Welsh</b>
Write Welsh

3. Disability

Do you consider yourself disabled?



Do you have a work limiting health condition?

- 4. What is your ethnic group?
- White a.
- Mixed/Multiple ethnic groups b.
- Asian/Asian British C.
- Black/African/Caribbean/Black British d.
- Other ethnic groups e.
- What is your age? 5.

**Please specify** 

0 – 15 years	16 – 24 years
25 – 44 years	45 – 64 years
65 – 74 years	75 + years

Thank you for completing this form



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