

<p style="text-align: center;">POLICY REVIEW OF PUBLIC TRANSPORT IN WALES: A RESPONSE TO THE NATIONAL ASSEMBLY FOR WALES BY CARMARTHENSHIRE COUNTY COUNCIL</p>

1. INTRODUCTION

1.1. Carmarthenshire County Council welcomes the opportunity to comment on what is an exceedingly important subject, and concurs with the statement of the Chair of the Environment, Planning and Transport Committee, included in the Foreword to the document, that “ we want public transport in Wales to be integrated, accessible, affordable and an attractive alternative to the car”. This is an objective that all having an interest in creating a sustainable transport system for Wales would support, and would congratulate the Assembly in taking the initiative to drive forward the debate. Carmarthenshire County Council endorses many of the recommendations contained in the Consultation Report, however it would wish to make the following comments which are intended to contribute positively to the national vision for public transport. Paragraph numbers refer to the paragraph numbers contained within the Consultation Report.

2. PUBLIC TRANSPORT TODAY

2.1. Analysis of the breakdown of journeys by mode illustrates quite clearly the dependence on the car/van, however the analysis fails to recognise that geographic exclusion is a major problem in rural areas and should be given greater credence in the analysis. Over-dependence on the car particularly in rural areas is borne out of necessity rather than luxury, and is as much a concern as the absence of households without a car in urban communities.

Buses

It is noted that significant emphasis is placed on buses as the most popular form of transport, however in many areas it is the only form of public transport. In Carmarthenshire a number of the bus operators are not national companies and operate at very low profit margins they are dependent upon school travel and subsidy, and are unable to regularly re-invest in new vehicles, thereby compounding any opportunity to raise the image of public transport.

Rail

The content of the section on rail to some extent offers up very little scope for the choice of rail as an alternative to the car, only in those areas with a well developed and maintained

infrastructure. However, there is to some extent a failure on behalf of everyone to recognise the opportunity for rail travel on existing lines e.g. Heart of Wales Line, that would benefit from flexibility being built into the rail network. Clearly effective integration with different modes of transport, such as cycling, will only succeed if rail operators address the current shortcomings.

Community Transport

Community Transport in rural and urban areas is important to those communities who are socially excluded. We are a little disappointed at the lack of examples of community transport initiatives in Wales, as potentially they offer scope for trips outside timetabled services and can address the needs of a range of client groups that a standard bus or rail service might not be able to address.

Role of The National Assembly

Whilst the role of the Assembly is clearly defined in terms of public transport the current lack of powers to direct the operation of public transport is a concern, particularly if increased patronage of public transport is to be delivered on a pan Wales level. The delivery of the vision expounded in the Transport Framework is unlikely unless “carrot and stick” measures are adopted by the Assembly.

We are encouraged by the reference to spatial planning and the close inter-dependence between land use planning, economic regeneration, social inclusion, sustainable development and transport plans. Notwithstanding this support we take the view that that the National Spatial Planning Framework should drive both the National Economic Development Strategy and the Transport Framework; unfortunately the word complementing is used in the document which fails to recognise the importance of spatial planning as a context for strategy development.

Role of Local Authorities

The role of local authorities in delivering public transport is grossly understated in the document. There can be no doubt that if we are to encourage greater use of public transport then it will be local authorities who will have the strongest remit for this. In terms of local authority powers to ensure that public transport is promoted, from a land use planning perspective local authorities in SW Wales have grouped together to form the SW Wales Regional Planning Group in the absence of a regional planning framework for the area and this has a key

strategic planning context. Similarly, the importance of development plans i.e. the Unitary Development Plan and the strategic settlement framework that is developed in the Plan, has a strong influence on travel patterns which is why there is a strong emphasis on the links between the Unitary Development Plan and the Local Transport Plan.

3. VISION AND QUALITY

- 3.1. The vision for public transport ten years from now is not something that we would disagree with, however we would argue that it is not planning decisions for new development which include public transport as an essential provision that is important, it is the strategic framework within which the decisions are made that is key. With respect to making services more attractive this Council would seek where possible more frequent services in rural areas, and do not believe that it should be just an urban areas consideration.

Our Challenge

The key change set out is positive however this Council consider that a stronger emphasis needs to be placed on public transport if it is to achieve the vision set by the Assembly. Green Travel Plans for example and the use of “carrot and stick measures” are vital if we are all to play our part in achieving the vision.

Elements of Quality

As a key starting point driving up the quality of services is supported, the word **flexibility** however needs to be incorporated if we are to ensure that public transport in its widest sense is attractive to all.

Driving Up Quality

We support the need for high quality to be the determining factor in considering value for money, however there is unease that with the Best Value agenda quality could be lost at the expense of price.

Quality Partnerships

In order to ensure that Quality Partnerships work we fully support the need for local Traffic Commissioners at a regional and local level, with responsibility to the Assembly. The current system is too remote and requires a regional/local dimension if

it is deliver the role of public transport “watchdog”.

Kite Mark

Recommendation 1 : In principle whilst a kite mark would seem an important step in the quest for quality standards, it must be appreciated that it could also deter some operators who operate to low margins particularly those in rural areas. Additionally the different modes of public transport would need to agree a common criteria and an appropriate “watchdog”.

Affordability

With social inclusion being one of the guiding themes for a Better Wales the affordability of public transport is an important consideration. Whilst accepting the benefits of concessionary fares schemes the real costs of travel for disadvantaged groups has to be offset by a form of welfare payment if transport poverty is to be overcome. We welcome the extension of concessionary fares to taxis, as the taxi has a role in areas excluded completely from public transport.

Investment

Recommendation 2 : Historic levels of under investment are a reflection of national policy, and if there is to be any push towards creating the vision for public transport then local authority funding must be sustainable over a longer period of time than at present. Increases in revenue expenditure are vital but these must also be sustainable and flexible to meet the dynamic nature of service provision in those areas where commercial operations become unattractive. Transport operators clearly have a key role to play but have to be assisted if the linking of capital and revenue investment to bus quality partnerships is introduced by the Assembly.

Key Projects

Recommendation 3 : A number of the projects identified offer opportunities to promote greater use of public transport and in general we find favour with the majority of projects. The school transport demonstration project is a scheme that deserves to be supported however we would caution the Assembly that this should not be seen only as a an identifiable “ American yellow school bus project” and needs to appreciate that operators utilise school transport for public transport purposes and such an approach could in itself be self defeating.

One of the biggest areas of concern remains the congestion caused by the school run and whilst one can agree that the Assembly and local authorities have a role to play with operators, passengers and other stakeholders to take forward key projects there has to be recognition that reducing dependence on the car in this instance might mean the adoption of “carrot and stick” measures and a review of school transport policy.

Delivering the Vision

Recommendation 4: We support the focus on existing regional partnerships delivering improvements to the public transport system, and would remind the Assembly that the strategic planning framework delivered through the South West Wales Regional Planning Group, the strategic economic development framework delivered through the South West Wales Economic Forum and the regional transport strategy delivered through SWITCH are integral to the greater use of public transport. We firmly believe that the best way forward is through enhancing existing regional collaboration between local authorities who are able to lead public transport improvements which are integrated with other policy objectives and activities, e.g. land use planning, local economic development, local social inclusion objectives, etc. It is exceedingly doubtful whether an all Wales approach through a single interest body would achieve true integration in the way that a local authority could. Additionally accountability in local councils is with elected representatives who are able to interact with local communities and are thus able to articulate the views of local communities on public transport provision.

Whilst both regional public transport strategies and regional plans are non statutory it is only through the statutory Unitary Development Plan that respects different local issues that the policy frameworks can be developed. It is suggest that in time regional public transport strategies should become statutory if they are going to deliver a pan Wales effort for greater utilisation of public transport.

Recommendation 5 : The role of the Assembly is accepted if it is going to fund the improvements at regional and local level, however there is at present no indication as to the times-scale of regional public transport strategies and how they will be used to draw down funding.

4. EXISTING ORGANISATIONAL STRUCTURES

- 4.1 Recommendations 6-10 :** The potential of regional consortia to plan and implement developments is acknowledged and whilst it is accepted that SWIFT and TIGER may have achieved more to date, the role of SWITCH should not be underestimated. The current working arrangements within SWITCH, which has local support, illustrates the commitment of its constituent authorities to succeed with officer and member/officer representation on the consortium. A formal partnership constitution is currently being considered by SWITCH.
- 4.2 In terms of establishing more robust regional consortia we agree that existing arrangements should be consolidated, but that means covering all transportation aspects not just public transport, together with more formalised arrangements with regional planning and economic development fora. In all cases there is need to give added strength to the regional consortia by investigating a possible statutory base, but we do not feel that a SWITCH PTA is the best way forward.
- 4.3 The need to raise the profile of regional consortia activities is supported by the Council, and efforts to promote the SWITCH consortia are ongoing. It is felt that such promotion could be linked to the quality mark or kite mark. Whilst we would not be averse to discussing staff and financial resources allocated to delivering regional and local objectives, there has to be recognition that if the vision is to be achieved then a review of all transport related budgets will need to be undertaken both nationally and locally.

5. ALTERNATIVE ORGANISATIONAL STRUCTURES

- 5.1 The case for leadership at an all Wales level via the Assembly in the role of a Welsh PTA with delivery through regional consortia may have some merit, but we consider the partnership between the National Assembly and local authorities via the regional consortia to be a preferred way forward as there is no credible evidence that a Passenger Transport Authority or Executive for the whole of Wales would offer any improvements in public transport provision. The preferred approach nevertheless has to be strengthened by the appointment of regional traffic commissioners responsible to the Assembly if we are to drive up and maintain public transport standards.

6. MONITORING AND EVALUATION

- 6.1 Recommendations 11-12:** The importance of monitoring and evaluation cannot be over emphasised, therefore we take the

view that every effort should be made to collect the evidence to guide policy development in the first place and we should then be measuring the outputs from new projects. The evidence has to be objective and reliable, but would stress that there has to be a balanced assessment of the qualitative as well as quantitative measure of the outputs. Under the circumstances we would recommend that the Local Government Data Unit working in conjunction with local authorities and the National Assembly advises on an evaluation framework for measuring the benefits of targeted public transport.

6.2 Recommendation 13 : We support the recommendation that passengers be involved in drawing up the evaluation framework. However, if the evaluation framework is to be owned by all, then we would support the need for all transport passenger groups to be represented. This should also include the community transport sector and taxi operators as well as the formal consultative user groups.

6.3 Recommendation 14 : Learning from good practice in Wales and elsewhere is supported; there are already formal and informal mechanisms in place via the SWITCH consortia to gather intelligence on public transport policy and public transport projects. We would nevertheless advise that given transportation planning's close links with land use planning and economic development that this intelligence embraces wider considerations.