

WELSH LOCAL GOVERNMENT ASSOCIATION

RESPONSE TO

THE NATIONAL ASSEMBLY FOR WALES
ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE'S
POLICY REVIEW OF PUBLIC TRANSPORT

CONSULTATION REPORT

INTRODUCTION

1. Local government in Wales shares the Committee's commitment to improving public transport and hence the quality of life for all our communities. We offer this response to the report of the Assembly's Environment, Planning and Transport Committee as a positive contribution to achieving our shared objectives.
2. The Association appreciates the Committee's careful consideration of local government's evidence submitted to date, and trusts that this submission will be fully taken into account in the Committee's final recommendations.

VISION AND QUALITY

3. Local government in Wales shares the Assembly's vision of public transport as an integrated, accessible, affordable and favoured mode of travel of the people of Wales. The Committee must recognise that the potential to achieve this vision varies hugely across Wales, with rural areas and small towns likely to remain very much more dependent on private transport than larger towns and cities.
4. The Association welcomes the Committee's emphasis on quality provision. But even quality public transport will only attract passengers if it is complemented by policies on economic development and land use planning that make travel by bus or train feasible. The National Assembly needs to ensure that the National Economic Development Strategy, Planning Policy Wales and National Spatial Planning Framework are fully 'joined up' and compatible with its objectives for public transport.

Recommendation 1 – Quality

5. The Association supports the principle of a quality kite mark for quality bus partnerships and contracts, and for other modes of public transport. The Association is ready to work with the Assembly, transport operators and transport users to develop an appropriate scheme.
6. There is more that should be done to promote quality, in particular improving regulation and enforcement. We urge the Committee to adopt the recommendations already made by the Association, in particular that local authorities, the Assembly, users and bus operators should establish indicators of performance for ALL services (not just those in quality partnerships and contracts) that are monitored and enforced by the Traffic Commissioner. The effectiveness

of the Commissioner's operations should also be reviewed. The Committee should also adopt our recommendation that traffic controls e.g. speed limits and parking controls, should be more rigorously enforced as abuse favours the private car and can undermine promotion of public transport. In the longer term, the Assembly needs to recognise that existing powers to influence an essentially market-lead system may be insufficient, and the reregulation of bus operations will need to be considered.

Recommendation 2 - Investment

7. The Association wholeheartedly agrees that historic levels of under-investment in public transport should be addressed. It is not clear how the substantial increase that is required will be secured, especially given the equally pressing demands on local authorities for investment in other services such as education.
8. The Association stresses that investment is a fundamental requirement for change at national, regional and local level and should be the Committee's key recommendation.

Recommendation 3 - Priorities

9. The Association welcomes the proposal that the Assembly and local authorities should work with other stakeholders. We have the following comments on the priorities suggested:
10. **Concessionary fares** - The extension of the concessionary fares scheme to other modes and other groups could require substantial investment that does little to improve the overall quality of public transport. The Assembly needs to balance the prospect of a high quality service at a modest cost to users against maintaining the current service at nil cost for certain users. 'Grey areas' between conventional bus demand and responsive services (which may be excluded from the scheme) need to be addressed.
11. **All – Wales Passenger group** – it is not clear how such a group would relate to existing user groups. The Association would not support the creation of another committee.
12. **Second generation transport** – light rail is very expensive and of limited potential benefit to most of Wales. The Association suggests that investment in mainstream public transport is a much higher priority.

Recommendations 4 and 5 - Regional Public Transport Strategies

13. The Association supports collaboration and co-operation between authorities to tackle issues that affect the wider area, and therefore supports the preparation of regional public transport strategies prepared on this basis. Regional strategies should address the strategic needs of the area and recognise the existence of local needs and priorities. The relative balance between regional and local needs will vary from area to area. For example the geographical scale of north Wales (100 miles east – west) and settlement patterns mean that most transport movements are relatively local and are best tackled through local transport plans.

In contrast, the geography and population of south east Wales means that a regional approach is appropriate for a wider range of issues.

14. The Association does not agree that the National Assembly's decisions on funding should be solely guided by regional priorities. Local needs are also important and the cost of many solutions will continue to require Assembly financial support. Most revenue support for bus and unconventional service can only be dealt with locally and hence would not feature in the regional approach.
15. The Association does not agree that '*additional expenditure on transport would be justified only ... where results can be monitored and evaluated*'. It is important that outcomes from investment are assessed, but changes in travel occur for many reasons other than public investment (e.g. because of new development) for which local authorities cannot be held responsible. It must also be recognised that the introduction of new or additional public transport services may not in the short term make any meaningful contribution to effecting modal shift, particularly in the case of locations which have been devoid of services for a considerable period of time. In order to influence travel decisions and patterns, it may be necessary for new services to operate for a longer period without reaching patronage targets that would justify their continued existence. The Assembly's expectations for modal shift are too high and the factors affecting modal choice do not appear to be appreciated.

EXISTING ORGANISATIONAL STRUCTURES

16. The Association firmly believes that the best way forward is through enhancing existing regional collaboration between local authorities. This approach offers the advantage of:
 - ensuring public transport provision is joined up with other local services, in particular traffic management, road safety, land use planning and economic development;
 - ensuring that strategic public transport needs are met at the same times as ensuring responsiveness to local circumstances;
 - cost effectiveness – no new bureaucracies
 - local democratic accountability

Recommendation 6 – Funding of consortia

17. The Association agrees with the recommendation that regional transport consortia should agree with the National Assembly how objectives will be delivered and the availability of funding. It must also be recognised that partner organisations should remain independent.

Recommendation 7 – strengthening consortia

18. The question of how to establish more robust arrangements is a matter for each regional consortium to reflect their different circumstances and needs. The Association proposes that each consortium should build upon the fundamental principles that are set out in Annex A. These proposals will ensure consistency of approach, whilst maintaining local accountability and responsiveness.

Recommendation 8 – statutory basis of consortia

19. Section 2 of the Local Government Act 2000 allows local authorities to ‘do anything’ to promote the economic, social or environmental well being of their areas. The Local Government (Wales) Act 1994 allows one authority to contract with another to deliver services. Authorities therefore have the powers to put collaborative arrangements on any suitable statutory footing, e.g. a joint committee or a company limited by guarantee, or to continue with more informal partnership arrangements if they so wish.
20. The Association believes that existing legislation is sufficient to ensure that the regional consortia can operate effectively and that the local authorities in each consortium should decide the most appropriate arrangements for their areas.

Recommendation 9 – involvement of the National Assembly in consortia

21. The Association has previously called for the inclusion of trunk roads and motorways, which are the National Assembly’s responsibility, in local and regional transport plans. It is not clear if the proposal that the National Assembly should be represented on the consortia means that it has been agreed that issues relating to trunk roads and motorways can be included.
22. For the most part, regional consortia discharge local authority functions. The consortia already seek the views of many partners in public transport including operators and users on how those functions should be discharged. Consortia may also wish to seek the views of the National Assembly if they do not already do so, and will be involved in discussions with the Assembly on funding. The Association considers that it would not be appropriate (or legal) for the National Assembly or any other party to take decisions on local authority functions.

Recommendation 10

23. The Association agrees that better branding of the regional consortia’s work may be necessary but suggests that this does not have the same priority in all parts of Wales.

ALTERNATIVE ORGANISATION STRUCTURES

24. The Association considers that there is no credible evidence that a Passenger Transport Authority or Executive for the whole of Wales or south east Wales would offer any improvements in public transport provision. Furthermore transposing an urban model to a rural environment will not work. A PTA would fail on many of the criteria the Committee has suggested should be used to evaluate options. In particular a PTA:
 - would have little influence on other policies that impact on public transport, notably traffic management, land use planning and economic development;
 - would involve substantial start-up and operational costs that would be better invested in services;
 - would not be close enough to the user – implicit in the expectation that divisional offices would be required;

- would detract from the current progress being made by regional consortia;
 - as a purchaser of services would have a more limited impact on services than many expect.
25. We question the legal basis of a PTA that worked through consortia of local authorities, effectively directing the use of their own resources (paragraph 5.9) as well as the unwieldy bureaucracy and lack of accountability implied in such an arrangement.

MONITORING AND EVALUATION

26. The Association stresses that transport movements are the outcome of complex decisions by individuals and businesses, that neither the Assembly nor local authorities can control. Other factors, such as fuel prices and the location of development, can have at least as much impact on travel patterns as public transport services. More needs to be done to understand how decisions on modal choice are made.

Recommendations 11, 12, 13 and 14

27. The Association supports the principle of developing an evaluation framework, involving passengers, and the promotion of best practice. It should take advantage of the considerable work that has already been undertaken on this subject.

ANNEX A PRINCIPLES FOR REGIONAL PUBLIC TRANSPORT CONSORTIA

Almost all powers and duties to support and improve public transport rest with local authorities. All authorities have agreed that collaboration and co-operation on a regional basis is the best way to discharge some of those functions. The extent of their collaboration and the form that it takes has to remain a matter for authorities.

Local authorities should decide the best geographical coverage of a consortium to reflect existing and potential travel patterns. This may include areas outside Wales if appropriate.

All local authorities in the area covered should be members of the consortium. This may include authorities outside Wales.

Local authorities should consider inviting other organisations to participate in the consortia. These should include:

- Public transport operators
- Representatives of passengers
- The National Assembly for Wales
- National park authorities
- Others as appropriate e.g. police authorities

Other members of a consortium should have full opportunity to contribute to the development of policies as well as commenting on draft proposals.

Decisions on the discharge of local authority functions should be the responsibility of local authorities. The local authority members of the consortium should consider how they wish to take decisions, in particular whether they wish to delegate any functions to the consortium (e.g. through the formation of a joint committee).

Consortia will need to consider arrangements for funding their operations, for example through subscription, and whether they wish to establish staff dedicated to supporting the work of the consortium.