



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

## **National Transport Plan Consultation Questions**

The following questions are provided to help structure responses to the consultation on the National Transport Plan.

The closing date for consultation responses is **Monday 12<sup>th</sup> October 2009**.

Responses to the consultation document can be submitted in writing or electronically via email. Please forward electronic responses to

[nationaltransportplan@wales.gsi.gov.uk](mailto:nationaltransportplan@wales.gsi.gov.uk)

Written responses should be addressed to:

**National Transport Plan consultation**

Transport Policy and Legislation Unit

Transport & Strategic Regeneration

Department for the Economy and Transport

Cathays Park

Cardiff

CF10 3NQ

Please note, the Welsh Assembly Government intends to publish a summary of the responses to this consultation document. Normally, the name and address (or part of the address) of its author are published along with the response, as this gives credibility to the consultation exercise. If you do not wish to be identified as the author of your response, please state this expressly in writing to us.

## **Your details**

If you are responding on behalf of an organisation or group please give the name of the organisation here and your contact details below.

Name of organisation: The Community Transport Association (CTA Wales)

About CTA:

The CTA is a rapidly growing UK-wide charity, operating on a devolved country structure, giving voice and providing leadership, learning and enterprise support to member organisations in the third sector delivering innovative transport solutions to achieve social change. The CTA also promotes excellence through training, publications, advice, events and project support to promote voluntary and community local transport providers.

In Wales, we work to support our membership through our offices in Swansea and Rhyl. The Welsh Assembly Government provides core funding to the CTA as the “voice of community transport” in Wales to enable us to support and develop new and existing CT operators across the country and to serve as advocate and promoter of the sector.

Our response has been circulated to our members for comment prior to submission and approved by our Wales Committee.

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## Questions

1. Do you think the proposals for integrating transport at the all-Wales level are the right ones to deliver the vision for transport?

Yes,  No

### Comments

Overall, CTA Wales believes that the proposals at the all-Wales level offer a comprehensive suite of actions in support of the overall vision for developing integrated solutions to transport issues in Wales. However, we would make the following detailed comments on the specific actions proposed:

#### **2.1 Sustainable Travel Towns**

We would like to ensure that community transport is included in the range of transport and access solutions developed in any new Travel Town initiatives, to ensure social inclusion for all, and that this is supported by revenue funding.

#### **2.2 Integrating the impact of travel into wider decision making:**

The CTA strongly supports the aim to strengthen the role of transport planning in policy development and planning. In addition to modeling journey time based on car ownership and the availability of public transport services, travel impact analyses also need to consider accessibility for people who do not have cars or find it difficult to use conventional public transport services due to age, mobility, location or poverty. This will be particularly important in policy areas and for services which are disproportionately accessed by elderly and disabled people (e.g. health and social care services). We would welcome further elaboration of how the Welsh Assembly Government (WAG) will ensure that this will be achieved both at the national level and in more local level decision making.

Transport planning in relation to schools and education has been picked out for particular emphasis. We believe that transport planning should be included across other WAG departments' work as well, particularly in relation to access to health and social services.

The current restructuring of the Local Health Boards and NHS Trusts gives an opportunity to embed accessibility planning into the way that services are planned from the outset, rather than being seen as a bolt-on. In rural areas in particular, difficulty in accessing health services has been identified as a key issue in the WAG's recent consultation on Rural Health Planning and CTA believes that the National Transport Plan should acknowledge and support the relevant actions in the emerging Rural Health Plan. We note in chapter 8 "Assessment and Appraisal" that health impact assessments and rural proofing have been carried out, but we would like to see both these areas strengthened considerably.

#### **2.3 Increasing Healthy and Sustainable Travel Choices**

The CTA strongly supports this aim and agrees that raising awareness of the services that are available is a very important part of this work. We hope that a wide range of stakeholders, including the third sector, will be involved in determining how transport information can be

disseminated effectively. (This is also a key issue that arose in the recent “Use of Public Transport by people who have Visual and Sensory Loss” report which was submitted to the WAG earlier this year, where the most urgent priority identified by the working group, of which the CTA was a member, was that public transport operators and public transport information providers should improve the accessibility, quality and dissemination of information.)

We hope that the Assembly Government will play a lead role in distributing lessons learned and examples of good practice, and the CTA would be pleased to facilitate community transport input into this process.

We agree that personal travel planning sites can provide a useful tool. It is as important to train local advisors and those that work with potential public and community transport users in using these sites as it is to promote them to individual end users – they can be a useful advisory tool and can assist in “travel training” those who need additional assistance to make sense of travel and timetable information.

Although there is a link to community transport on the Traveline website, the flexible nature of community transport and Demand Responsive services has in the past made them difficult to include within travel planning software (such as that utilised by Traveline Cymru). This can reinforce the perception that transport services are lacking in rural areas, when in fact flexible / on demand services may exist. The CTA would be pleased to work with the Welsh Assembly Government to ensure that personal travel planning sites include the broadest view of the services that are available.

We would welcome more information and clarity about the proposed Welsh Transport Entitlement Card and we hope that connecting CT services, such as those providing access into the main bus network from isolated rural areas, will be included in the integrated ticketing initiatives which are proposed.

## **2.4 Improving Local Bus services**

The CTA welcomes the aim ‘to improve the quality and integration of local bus services’ and the emphasis given to the importance of community transport services in assisting those with specific mobility needs or who live in areas which cannot support conventional bus services. In addition, we would note that, like local bus service provision (as noted in the first paragraph of this section), the availability and nature of community transport varies from area to area. These services rely heavily on public funding and on local community input in the form of volunteer management boards and, often, volunteer drivers and organisers.

It is also important to note that community transport services, while sometimes more expensive in cost-per-passenger terms, provide a highly personalised level of service, often enabling individuals to maintain their independence and remain living at home for longer, resulting in less intensive and costly health or social care interventions. It also contributes to the Welsh Assembly Government’s wider Health, Social Care and Well-Being (HSCWB) policy objectives.

We support the action to achieve better integration with the conventional public transport network but we would note that physical integration e.g. the development of transport interchanges should run parallel with better integrated information provision. However, we also think that more work needs to be done to understand the barriers to integration and how these challenges can be overcome.

We welcome the stated intention to refresh the WAG’s 2002 report “Community Transport in the Welsh Transport Network”. While progress has been made against many actions in the 2002 report, there remain some areas where progress has been much more limited or non-

existent, and inconsistencies remain between Local Authority and LHB / Health Trust areas in implementing the recommendations. In addition, the policy and legal framework has moved on in the intervening years, particularly as a result of the provisions in the Local Transport Act 2008. The CTA would welcome the opportunity to assist in the review of the report.

We note the pledge to support “innovative community transport services, such as the demand responsive ‘dial-a-ride’ Bwcabus service in Carmarthenshire”. Whilst we are pleased the WAG recognises the sector’s ability to lead and deliver in terms of innovation, we note that the Bwcabus service has been wrongly labeled as a community transport<sup>1</sup> service. In fact, it is an innovative mainstream demand responsive bus service, which is piloting the efficacy of new technologies when applied to fixed route services, utilising flexibly registered feeder routes. The service is run by conventional bus operators under tender to the local authority with limited community involvement in the management of the scheme. CTA understands that tender specifications did not include opportunities for the delivery of either the feeder or fixed route services under Community Bus permits.

We strongly believe that the Welsh Assembly Government should not only support “innovative” schemes but, where these schemes are successful, should facilitate and promote the roll-out and sharing of good practice, including lessons learned. However, it is important to maintain funding for proven CT services also, such as Dial-a-Ride services for elderly and disabled people, rather than putting them in a position of having to reinvent themselves periodically in order to gain short-term project funding.

We welcome the pledge to include “full implementation of the Local Transport Act 2008” and are keen to support WAG in achieving this, in particular by helping community transport operators to take advantage of the new opportunities afforded by changes to the rules for Section 19 and Section 22 permits, and also by supporting the sector during the changeover to time-limited permits to ensure that CT provision is not lost.

Community Transport Operators have more scope than ever before to run local bus services themselves, particularly as a result of changes to Section 22 permit rules. Some larger CT operators also hold full Operators Licences enabling them to provide mainstream bus services, investing any profit back into supporting other services provided for the local community. However the advent of flexible route registrations now means that commercial operators can also run Demand Responsive Services, with some resultant difficulties arising in procurement practices.

<sup>1</sup> We define Community Transport services as those which are run and developed by the community for the community. CT services are typically governed by local volunteer management boards, and may be run by charities, social enterprises or other not-for-profit organisations. CT services often, but not exclusively, use volunteer drivers and organisers. CT operators often bring wider benefits to the local community – such as affordable downtime access to accessible vehicles, additional assistance and support to service users which may not be available on mainstream bus services, and volunteering opportunities which can benefit the economically inactive, unemployed or those who are seeking a way back into work.

## **2.5 Improving Rail Services**

We would like to see reference to community transport’s role in helping service users, particularly “disabled people and vulnerable users” access rail services, although all too often, this service is constrained by the difficulties users face at the end of their journey when trying to transfer from community transport to stations and trains.

## **2.6 Improving access to key sites and services**

We support the aim to improve access to key sites and services, however we would note that some of the issues outlined in the narrative are not addressed by the actions which are identified.

In particular, there is no action to address gaps in the transport network and poor access to some key settlements. Community transport services are well placed to help to address these issues, particularly where conventional public transport services fail. In addition, there is no action to deliver shared access to personal travel. We believe that there is scope to better promote and facilitate car sharing across Wales, and to develop designated Park and Share sites.

We welcome the pledge to maintain a commitment to free concessionary travel on local bus services for elderly and disabled people but we are disappointed that no mention is made here of concessionary fares in relation to community transport. Since 2005, the CTA has been managing the WAG's Community Transport Concessionary Fares Initiative (CTCFI) which aims to extend concessionary transport to very elderly and severely disabled people who are unable to use conventional bus services. The initiative was set up to address the inherent inequality in the mainstream concessionary fares policy which meant that some of the most vulnerable people did not benefit from the free bus pass to which they are entitled.

In March 2009, the Deputy First Minister committed the Assembly Government to support the CTCFI for a further three years to March 2012 in order "to develop a model [for the long term] that provides an acceptable level of concessionary travel, supports the broader development of the community transport sector and is more sustainable in the future" (Extract from Deputy First Minister Ministerial Statement, 10/03/09). However, the extension only applies to the existing 15 operators, and therefore users in several areas of Wales continue to be disadvantaged. CTA believes that any review of the mainstream concessionary fares policy must also include the findings from the evaluation of the CTCFI pilot in 2008.

As a member of the all-Wales working group, we welcome the pledge to help deliver the recommendations of the review of non-emergency patient transport services. Access to health care is an issue of particular concern to many community transport users, particularly as these journeys are often made when people are at their most vulnerable. Elderly and disabled people and those with long term life-limiting illnesses have a disproportionate need to access health care services, yet these are groups that are also more likely not (or no longer be able) to drive, and may also be on low incomes. As stated in relation to 2.2 above, the National Transport Plan should also include an action to help to deliver the recommendations of the Rural Health Plan regarding access to health and social care and general wellbeing services in rural areas.

We note that the Assembly Government intends to publish plans to expand and improve the Traws Cambria X40 long distance bus network. We hope that these plans will include a review of the lessons learned from the current network, including an analysis of the value for money of these services.

We welcome the intention to publish an action plan with proposals for modernising the Blue Badge scheme by 2010, although we would be concerned if the timescale for implementation differs from England, since this could cause difficulties for disabled service users who frequently utilise community transport to access cross border secondary health care services e.g. Powys to Hereford or Shropshire, or Flintshire to Merseyside.

## **2.9 Improving the sustainability of freight transport**

The proposed transport advice programme, including Green Fleet Reviews, to reduce emissions from car and van fleet operators, could also assist passenger transport operators (both community transport and bus companies).

2. Do you think the proposals for integrating transport on the north/south corridor are the right ones to deliver the vision for transport?

Yes  No

Comments

We agree with the comment on P19 that “patterns of bus travel tend to be stronger when linking to larger urban centres, with community transport playing a significant role in connecting more isolated communities with local key sites and settlements, often filling gaps in mainstream public transport provision”. However we would note that this point is applicable across Wales, although it is not repeated in the analysis of the North, South or Mid Wales East-West corridors.

However, we hope that the review of the Intra-Wales air service (para 3.2) will take into account the planned changes to long distance rail and bus services, as a greater proportion of the population are able to access these services e.g. through interchange with the services along the route, which again provides greater opportunities for development of community transport feeder services.

3. Do you think the proposals for integrating transport on the east/west corridor in south Wales are the right ones to deliver the vision for transport?

Yes  No  Partly

Comments

CTA would like to see a greater emphasis on the social factors dominant in much of the area and reference to the WAG’s Heads of the Valleys Strategic Regeneration Area (SRA). The importance of improving access through supporting the greater integration of community transport services has been identified as a key area in the programme, perhaps reflecting the higher levels of ill-health and social exclusion found in some of the SEW valleys.

We also feel that greater reference should be made to the other SRA’s in the other regions of Wales, since transport and access have been identified as key issues in these as well.

4. Do you think the proposals for integrating transport on the east/west corridor in north Wales are the right ones to deliver the vision for transport?

Yes  No

Comments

CTA is surprised that there is no mention of existing community transport services or future opportunities for using CT to plug gaps in the vast rural areas of North Wales. As TAITH's draft final RTP has stated, integrated transport solutions "must promote the use of community based solutions including car-sharing and car clubs as well as community transport services." It goes on to say "In a region with widely differing levels of demand for public transport, there are considerable opportunities to develop new models of mobility management that integrate all of the resources potentially available in both the commercial and public sectors with travel planning and management techniques. Already, successes such as the Deeside and Wrexham Shuttles, community transport schemes, car-sharing and car clubs indicate how unserved needs can be efficiently catered for helping to stabilise communities and promote growth in areas not initially suited to conventional bus and rail services".

Do you think the proposals for integrating transport on for the east/west corridor in mid-Wales are the right ones to deliver the vision for transport?

Yes  No  Partly

Comments

We welcome the recognition on p33 of the importance of improving connectivity in rural parts of Wales and would note that this is not limited to mid-Wales – both North, West and parts of South East Wales also have significant rural populations. However, we are disappointed that there is no reference to the vital role that community transport plays in the mid Wales area, and indeed the levels of unmet demand that currently exist for more service capacity, as evidenced in the recent TAS report this year in terms of accessible transport provision, overcoming rural isolation and social deprivation and in supporting community cohesion.

5. Do you think the National Transport Plan sets out the right balance between economic, environmental and social factors to enable transport to contribute to the Welsh Assembly Government's CO<sub>2</sub> equivalent emissions reductions target of 3 per cent?

Yes  No

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Comments

We are unable to comment on this in any depth, although we would state that much of community transport provides many-to-one or many-to-many services, thereby reducing the number of individual journeys. We feel strongly that social factors need to be strengthened in the plan, which in turn will support economic regeneration and environmental balance.

6. Achieving CO<sub>2</sub> equivalent emissions reductions from transport will involve sustained behavioural change by everyone. Do you think the National Transport Plan can do anything else to encourage people to choose the healthy and more sustainable modes of transport?

Yes  No

Comments

The success of initiatives to encourage people to choose healthy and more sustainable modes of transport will always jointly depend on the quality of the services available, the extent to which it meets the travel and personal needs of the individual, the ability of the individual to access available public transport and the level of awareness of existing services.

We welcome the aim stated in the introduction (P7) to ensure greater consistency of service provision for customers across the transport network in Wales. Consistency is important to give credibility to campaigns at a national level to encourage use of public and sustainable modes of transport, and the availability of community transport in areas where there is little or no provision currently should be addressed as soon as possible to ensure social inclusion for all..

7. Do you have any further comments to make on the National Transport Plan?

Yes  No

Comments

The actions in the NTP are not prioritised or costed. We are particularly concerned that the future of key revenue funding streams such as the Local Transport Services Grant, which provide critical core support for many community transport services, remains unclear. There is no clarity either whether there will be revenue funding available through the Regional Transport Plans. Given the escalating cost of the current all-Wales concessionary fares scheme, we are concerned that the commitment to maintain free concessionary travel on local bus services may result in budget cuts elsewhere in the support for local and community transport.

The long term vision on p.35 is urban-centred and makes no mention of the vision of transport and accessibility improvements in rural areas.

Finally, whilst walking and cycling are frequently highlighted during the plan, these options will not be available to a sizeable percentage of the population due to disability, limiting health conditions or indeed those who live in deep rural areas who would need to travel much longer distances to access services. Additionally, the demographic curve shows an increasingly elderly population in Wales whose transport needs have to be considered and planned for the future. Since there are around 90 community transport schemes in Wales, we estimate the global figure for annual passenger journeys is over 1 million, with the vast majority of these being for those people unable to use other forms of transport. We feel it would be appropriate to give greater recognition in the plan to the current and future role of this much needed form of transport in Wales.