



Welsh Government Consultation

Wales Transport Strategy: scoping report – REF: WG40446

Consultation on the draft Integrated Sustainability Appraisal Scoping Report for the Wales Transport Strategy

Action required: Responses by 31st July 2020

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Organisation	North and Mid Wales Association of Local Councils (representing approx. 30 larger Town and Community Councils in North and Mid Wales)
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Type of organisation	Other Public Sector

Q1	Do you support the findings of the review of relevant plans, programmes and environmental protection objectives? Are there any additional plans, programmes or environmental protection objectives you think should be added? Are there any that you would like to remove from the review?	YES	Yes(subject to further comment)	NO
Comments The plans set out a lot with regard to the environment but little about transport and its delivery. Although the Association supports the policy of environmental protection the scoping plan does not outline what aims and objectives are to be met with regard to transport delivery.				

Q2	Do you agree with the sustainability issues that we have identified? Are there additional issues and opportunities that the ISA should consider? If so what are they?	YES	Yes(subject to further comment)	NO
Comments				
The Association agrees with the what the ISA should consider and the plan for taking policy forward as set out below subject to our comments on ‘transparency and clear aims and objectives’:				
<div><div><div>Key Stages in ISA Process</div><div>ISA Scoping</div><div>ISA of WTS Options</div><div>ISA of Draft and Final WTS</div><div>Monitor Significant Effects</div></div><div><div>Key Stages in WTS Process</div><div>Evidence gathering and stakeholder engagement</div><div>Develop and consult on main issues, options and preferred option</div><div>Prepare Draft WTS and consultation</div><div>Prepare Final WTS for Assembly consideration</div><div>Publish WTS</div></div><div><div>↔</div><div>↔</div><div>↔</div><div>↔</div><div>↔</div></div></div>				



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Q3	Are there any particular topics or geographical areas of specific concern to you or your organisation?	YES	Yes(subject to further comment)	NO
Comments Nothing to add.				

Q4	Are there any changes you consider should be made to the ISA Objectives or Questions?	YES	Yes(subject to further comment)	NO
Comments The Association supports the policy to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. This will no doubt be difficult in some areas of transport provision but should be an objective.				

Q5	Do you have any comments regarding how reasonable alternatives should be developed?	YES	Yes(subject to further comment)	NO
Comments Nothing to add at 'scoping' stage. No doubt alternative approaches to transport delivery will become clear in the documents that follow.				



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Q6	Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the Wales Transport Strategy?	YES	Yes(subject to further comment)	NO
<p>Comments</p> <p>In clause 1.2 it states ‘Covering all modes, it sets out our strategic priorities and desired outcomes, providing a link to the wider priorities as well as plans at the local authority level.’ However we cannot identify clear priorities or desired outcomes.</p> <p>In clause 3.2 it sets out ‘Key Themes Resulting from the Review’ but all it says in the column headed ‘National well-being goals’ is a list of headings ‘A prosperous Wales A resilient Wales A healthier Wales A globally responsible Wales’. This does not set out any aims or objectives regarding transport. The aims and objectives should be included from those plans into the Transport Strategy in a similar way to the impact assessments referred to.</p> <p>The appraisals in themselves are good as a base for taking forward objectives, however these have not been identified in an understandable way.</p> <p>The plan lacks substance in ‘what is actually going to be done’.</p> <p>It is suggested that a clear schedule of aims and objectives is included so that the plan can be measured. The details of how the aims and objectives are to be delivered will no doubt be in future documents.</p>				

Q7	Do you support the approach to the integration of the impact assessments?	YES	Yes(subject to further comment)	NO
<p>Comments</p> <p>To consider all impact assessments together is a much better approach than having separate ones which need to be collated.</p>				

Q8	Do you support the findings of the initial screening work for the impact assessments?	YES	Yes(subject to further comment)	NO
<p>Comments</p> <p>To a limited extent yes. The impact assessments have little reference to rail use and the provision of improved rail services. Further study is required to assess both the existing rail passenger issues and those which can be identified into the future. Without a sustainable plan for rail services it will lag behind demand as has happened in the past. For example the last rail Franchise to Arriva Trains Wales was based on no growth in passenger numbers).</p> <p>It is recognised that Covid 19 may have an impact on future travel but as things stand Government appears to hold the view that life will return to normal at some point in the future few years.</p>				

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Q9	Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments?	YES	Yes(subject to further comment)	NO
<p>Comments</p> <p>The impact of reduced capacity on our trains leads to the following:</p> <ul style="list-style-type: none"> i) People not wanting to use the trains due to it being uncomfortable. ii) Trains being overcrowded to an extent where health and safety are an issue. iii) Fares should be at affordable levels for those on lower incomes and who cannot afford a car. If those in this bracket do not have access to public transport then they will find themselves in a restricted job market. iv) If a good rail service delivery is not achieved then people will continue to use private transport. <p>Public transport (buses, taxis and trains) should be integrated in the centre of major settlements (ie Rhyl, Flint, Prestatyn, Bangor, Llandudno and Llandudno Junction) where-ever possible. This to date has not be well achieved anywhere in the UK outside of the major cities.</p>				

Q10	Do you have any other comments?	YES	Yes(subject to further comment)	NO
<p>Comments</p> <p>The document (in our view) is full of words with little substance as to what is the overall delivery plan actually means. A summary with the objectives and aims of the scoping plan is recommended so everyone knows what we are actually going to do to achieve the objectives.</p> <p>The Association would like to suggest that the following policies should be included in the scoping plan:</p> <ul style="list-style-type: none"> i) That train services into the future provide not only for existing passenger numbers but future demand. This as a minimum should mean retention of the current number of seats per train. ii) The buses for both town and rural areas are an important part of any strategy which removes cars off the roads. A policy of retaining a public transport service to as many areas as possible should be part of the scoping strategy. 				

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Question A: We are under a duty to consider the effects of our policy decisions on the Welsh language, under the requirements of the Welsh Language (Wales) Measure 2011. We would like to know your views on the effects that the Wales Transport Strategy: scoping report would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The only Welsh Language Issues that the Association would wish to raise are@

- i) Transport indicator boards should be in both Welsh and English.**
- ii) Announcements should be made with correct Welsh pronunciation.**
- iii) Information on timetables and transport services should be in both Welsh and English in separate posters side by side (not combined which makes it long and difficult to follow)**

Question B: Please also explain how you believe the Wales Transport Strategy: scoping report could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

If the report is to be produced in both Welsh and English these should be done back to back so that it is easy to read in whatever language people require.

Question C: 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:

The Association is of the view that North Wales is often ‘forgotten’ and has the impression that South Wales is given preference. This may be due to population levels. However, the Association is of the view that a Minister for North Wales is essential, particularly in the delivery of transport.

The Association is willing to give oral evidence at a Welsh Government Committee if it were felt to be of value.



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Please complete the consultation form and send it to :

WalesTransportStrategy2@gov.wales

[Please include 'Draft Integrated Sustainability Appraisal Wales Transport Strategy' in the subject line]