

**Barry Town Council      Derek Wolfe**

The contents of the Outline Regional Transport Plan are generally welcomed.

This Council agrees that the Regional Transport Plan must include some radical proposals if the existing problems relating to transportation are to be overcome. These proposals should include urgent action in respect of climate change.

To achieve this, new sources of funding must be identified at an early stage and should include high levels of investment in public transport.

The vital linkages between the planning system and transportation planning are well made particularly in respect of land use planning and the need to reduce the demand for travel.

Overdependency on private car can only be overcome by the provision of a modern, integrated and sustainable public transport system.

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**Bridgend County Borough Council      Composite response from Directorate of Environmental and Planning Services – Highways and Transportation; Education, Leisure and Community Services; Office of the Chief Executive – Regeneration; Corporate Services – Policy Unit; Personal Services**

**These comments have been made solely by Officers of the authority and have not yet been endorsed by Members.**

Comments on our fundamental principles (Chapter 2)

The fundamental principles are acceptable, however greater emphasis needs to be placed on equality of access, recognising differing needs and priorities within communities, of place, interest and circumstance.

The fundamental principles are accepted. The key issue is around implementation and financial commitment to the principles and a greater commitment is required to partnership working.

The principles are clearly stated, logical and pragmatic.

Comments on our vision (Chapter 2)

We would only wish to see greater emphasis on the vision being 'responsive' – ie: the importance of effective engagement with citizens and communities to ensure that the vision is responsive to those needs.

The vision is fully accepted in terms of reducing/challenging reliance on the car.

The issue of public transport is vital, as are the health impacts of walking and cycling and reducing pollution.

The key issue will be managing the transition period between reduced car use and increased public transport use when the benefits are not immediately obvious.

The vision could benefit from acknowledging that a careful 'balance' is required when addressing the various component elements

Comments on our priorities (Chapter 2)

The document would benefit from showing a clear link between priorities and objectives

Priorities can also include improvement to system and process, planning and evaluation

Outcomes identified should be measurable

The priorities are clearly welcome, however the role of public education (including education in schools) needs to challenge the dependency on cars. School children have a lot of information on the environment, but at the same time, peer pressure and other influences say that passing the driving test and owning a car are appropriate social goals

Strong support

#### Comments on our analysis of the current situation (Chapter 3)

The RTP workshop held in BCBC provided the opportunity to input views, issues and experiences across services and partners

Fully accepted

The analysis is a clear and comprehensive overview of the current situation, good and bad, and provides a solid foundation for what must come next as the ORTP moves towards the draft Plan.

#### Comments on our consultation proposals (Chapter 4)

The proposals need to acknowledge the potential of working closely with Local Strategic Partnerships and in developing approaches to improve local relationships as LSPs become LSBs.

These are accepted

The consultation process so far has been comprehensive in terms of topics and the involvement of local authorities but lacking a little in terms of non-professional involvement. The future programme must address this more comprehensively and involve a wider audience to gain stronger legitimacy and awareness in the community. How will this be done (and who pays?) in the short time that is left before the draft plan must be submitted?

Is the stakeholder management strategy finalised and operating?

Will there be a public awareness campaign via newspaper and other media? Placing the plan in public buildings will not be sufficient to engage the public.

There is the danger that only 'the usual suspects' will become involved in the process.

#### Comments on our analysis of the problems (Chapter 5)

This is accepted. However the inter-relationship between health, transport and health inequality needs to be more fully explored

Bearing in mind the lack of quantification the method of analysis is probably sufficient for the process. The detail will emerge as the adopted Plan begins and develops over time.

The discussions are comprehensive, pragmatic and sensible. The common-sense approach avoids extremes (but sometimes extreme solutions are what's required).

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

F5: Access to employment sites in particular has been a local priority in increasing economic activity across BCBC. Those groups currently, or at risk of becoming, economically inactive correspond with low car ownership and often have complex transport issues linking employment, childcare, health and training

F5 is welcomed as necessary and sensible. There are also clear links to the emerging LDPs which must support and be guided by the RTP

N8: Supportive. BCBC's workshop in 2006 identified an objective to reduce unwanted/unnecessary journeys through better service planning and delivery methods. This shared objective requires effective joint working to be achieved

N8 is strongly supported. The recent press coverage of road user pricing shows how difficult it will be to win over hearts and minds. It is with the media that the work must begin in earnest.

Comments on our summary of problems (Paras 5.23 to 5.28)

Support. This is very much in line with BCBC's position

Accepted

The list is shorter and flimsier than what might have been expected from the detailed problem analysis in the preceding chapters.

Although correct, the list lacks punch.

Comments on the cornerstone of our strategy (Para 6.1)

Supportive

Accepted

Says the right things but reads more like a party manifesto rather a robust Plan.

Comments on our objectives (Chapter 6)

BCBC is pleased to note that the first two objectives in particular are about communities and individuals and meeting their needs in terms of social, economic and environmental wellbeing – this is the core of the community strategy

Accepted

The objectives bring the document into focus and provide a comprehensive and robust starting point for developing strategies and programmes.

Although implied in a number of the objectives, both positively and negatively, the omission of a direct reference to air travel and/or airports is to be regretted.

Comments on our approach to considering alternatives (Chapter 8)

Actions should include improving communication with service planning and local strategic planning mechanisms (eg LSP) and other key strategic partnerships

The RTP will need to acknowledge how changes in public service planning and delivery will impact on the plan, and work with partners to ensure that the impact is positive and maximises outcomes for local people

Following from the identified outcomes, Monitoring should seek to show the impact of actions in terms of benefits to individuals and communities. Local Service Agreements may provide a tool to do this, for example where particular aspects of access are an issue locally (eg to employment sites in BCBC), regionally and nationally.

A clarity and shared understanding, and responsibility, will make long-term goals more realistically achievable by effectively orchestrated action in local areas as well as regionally and nationally.

Very supportive of the direction being taken

Accepted, but a greater emphasis on community empowerment approaches needs to be taken forward

It is to be hoped that more robust analytical and technical work will both underpin and supplement (and hopefully support) the analysis as the Plan progresses.

Comments on the list of actions we feel are needed (Chapter 9)

Accepted

Comprehensive and supported

Comments on our monitoring proposals (Chapter 10)

It should be emphasised that the monitoring tools should include quantitative and qualitative approaches

Monitoring of the plan is critical to its success and to future funding opportunities. It is essential that a sensible, pragmatic and cost-effective strategy, well-managed and centrally controlled, supported by all the constituent authorities and partners who collect data, is developed as soon as possible.

The process that has been outlined in #10.11 is a sensible starting point but it must be focussed and progressed as a matter of urgency.

The Plan will not succeed without a clearly defined and managed monitoring strategy in place.

Comments on the general direction of our strategy

The importance of retailers and service providers changing their patterns of provision is crucial. This will require greater use of the internet and other systems. This can be a source of social exclusion and social isolation.

The overall strategy clearly intends to turn the ship around and point the region in a better, more sustainable, direction – but is it strong enough to do this efficiently and comprehensively and will it gain the support of other agencies whose remits are effectively ranged in opposition?

Will the strategy be supported by the emerging LDPs or be in conflict with their emerging land-use policies which may not be much further advanced from their preceding Structure Plans, Local Plans and Unitary Development Plans.

Other comments

The document is thorough and well-written, but thin (almost non-existent) regarding costs and the financial implications of the Plan (#8.21 recognises this, but does not give any supporting information)

The document recognises that targets are not SMART, but in a document such as this, if it is to be more than simply a shelf-filler, it needs more substance to the target setting

The general principles and vision are fine. The issue is always going to be weaning people from their dependency on the convenience of cars.

Reference is made to the home to school transport issue and it would have been helpful to see more concrete proposals which address the issue of concerns (real or otherwise) over safety, and the gap between good intentions to take the healthy options (walking and cycling) and the easy practice of taking motorised, and for many, free, transport

There is passing reference to School Travel Plans but a commitment to getting them implemented through statute (as in England) would be welcome.

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**Bridgend County Borough Council**

**Steve Moon**

Comments on our fundamental principles (Chapter 2)

I would like to see some reference to the CCW's 'ecological connectivity' project, which is looking to reduce fragmentation of habitats and isolation of species, and to support migration of species forced by climate change.

Comments on our additional outcomes F5 and N8 (Chapter 5)

No reference to the need to reduce the loss of biodiversity by 2010 and beyond.

Comments on the cornerstone of our strategy (Para 6.1)

This is welcome.

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**Caldicot & Wentlooge Levels IDB      Dean Jackson-Johns**

Comments on our fundamental principles (Chapter 2); vision (Chapter 2); and priorities (Chapter 2)

Would support general 'aims and union'. We are all working for a healthier and better environment. It is essential that there is an adequate and efficient public transport system if outcomes are to be achieved.

Comments on our analysis of the current situation (Chapter 3)

Not the Boards area of expertise - but we all feel and are aware of the current major problems and pressures Welsh transport system is under - this is not sustainable.

Comments on our consultation proposals (Chapter 4)

I would have hoped that the Drainage Board had been involved in face to face consultations as a considerable part of the infrastructure in question lies within the Boards Area - Cardiff to Chepstow (as was the CCW & EA). As you are aware the Board is a Statutory Body as defined under the Land Drainage Act 1991.

Comments on our analysis of the problems (Chapter 5)

As said in response to Chapter 3 - current situation is not sustainable - solutions need to be found.

Comments on our additional outcomes F5 and N8 (Chapter 5)

Agreed with in principle.

Comments on our summary of problems (Paras 5.23 to 5.28)

South East Wales is a particular problem (5.23). I again request when discussions are held in this respect that the board is consulted / in attendance - as we are the Statutory Body who manage the Gwent Levels Area and its vital land drainage system.

Comments on the cornerstone of our strategy (Para 6.1)

Agreed. Things need to change.

Comments on our objectives (Chapter 6)

As above 2 points above.

Comments on our approach to considering alternatives (Chapter 8)

A 'balanced' view point/perspective should be followed and full implications of 'alternatives' considered eg Road Pricing!!! Will force vehicles onto untolled roads? affect poorer members of community greater.

Comments on the list of actions we feel are needed (Chapter 9)

Would agree but again a balanced approach needs to be followed - and full implications of each carefully considered and costs?!

## Comments on our monitoring proposals (Chapter 10)

### Comments on the general direction of our strategy

Work needs to be ongoing to continue momentum already achieved. I again stress that a balanced approach / strategy needs to be followed - considering all relevant needs of those using transport infrastructure - one group should not disproportionately benefit at the expense of another - both in real and financial terms.

### Other comments

The Boards remit relates to the Gwent Roads area extending from Cardiff to Chepstow. We are the main Statutory Body responsible for the maintenance and management of all the vital land drainage system of this important area of South East Wales. The Roads area is a natural flood plain below high tide level with a very high ever present Risk of Flooding. There is much nationally valuable infrastructure within the Roads area eg main Cardiff/Paddington Railway/M4 Motorway (current and proposed Relief Road), A-Roads, Cycle Routes etc,etc. Also very valuable developed areas and sites of Special Scientific Interest. The Board must be consulted on any Proposals/Plans/Strategies affecting its area - and like the Environment Agencies response (our 'Sister' body) - FLOOD RISK must be appropriately assessed within the Strategy (all implications) (see Appendix C page 101 para 6), which is fully supported. The Boards area is the 7th most valuable Internal Drainage Board Area in the UK (out of some 200 such areas!) so the importance of the 'levels' area needs to be fully appreciated so please involve the Board in any discussions and/or consultations in the future.

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## **The Campaign for the Protection for Rural Wales**

**Margaret Hunt**

This response is made on behalf of the Newport and Valleys branch of the Campaign for the Protection of Rural Wales (CPRW). It thanks Sewta for allowing it the opportunity to comment upon the Outline document.

The format exactly follows that of the original response form. Underlined typescript has been used for emphasis and to indicate suggested textual changes.

Due to time constraints, it has not been possible to make a thorough check for respondent typing errors. Please excuse any that are detected.

### Comments on our fundamental principles (Chapter 2)

CPRW broadly agrees with the fundamental principles as set out in paragraph 2.1. The commitment to making a real difference to future sustainable transportation in South East Wales is applauded, and the results of action are anticipated with interest.

### Comments on our vision (Chapter 2)

While CPRW is an especially strong supporter of environmental protection, it endorses the other aspects of the vision as outlined in 2.2 (2<sup>nd</sup> paragraph).

### Comments on our priorities (Chapter 2)

Having assumed that the priorities are not placed in order of importance, CPRW's additional comments are:

2.3 Indent iv. – it is suggested that this ought to have stated: '...and improved public transport links...'

2.4 Outcome F4 (9) - a more definitive statement would have resulted from drafting this outcome as: 'Improving access to a broad range of employment opportunities'.

2.4 Outcome F6 (10) – it is important to improve public transport access to visitor attractions.

2.4 Objective 6 – in adopting the conventional economic performance reasoning, this objective is too orientated toward road transport.

#### Comments on our analysis of the current situation (Chapter 3)

The detailed analysis provides an extremely useful, and readable, contribution to the RTP Outline. Incidental comments are:

3.5 9<sup>th</sup> sentence – Chepstow enjoys a fairly comprehensive around town bus service, which might be considered to be equivalent to a service across town. Presumably, this also applies to such settlements as Cwmbran.

Figure 3.4 – in the interests of comprehensiveness, and in the light of the importance of links with England, it ought to have been indicated that trains run beyond Hereford (on the Manchester line), beyond Gloucester (on the Birmingham line) and beyond Bristol to destinations in South West England.

3.9 6<sup>th</sup> sentence – CPRW considers that where there are substantial numbers of pedestrians in urban areas, policy should dictate that adequate pavement are provided on both sides of busy roads.

3.9 8<sup>th</sup> sentence – the presence of beggars in subways can be intimidating to other members of the public.

3.9 Final sentence – Sewta area figures are needed to show the proportion of footpaths that are partially/totally blocked.

3.21 Penultimate sentence – commuter journeys to and from Newport on the South Wales to Gloucester, South Wales to Manchester and South Wales to Bristol railway lines are also important.

Table 3.16 – It is not known what is meant by the Home column.

Table 3.22 – the visitor attraction village (Area) of Tintern is not included; it is on the same bus route as St Arvans.

#### Comments on our consultation proposals (Chapter 4)

4.7 Final sentence - the respondent completed a questionnaire early in 2007.

4.9 3<sup>rd</sup> indent – cross boundary contact should include liaison across the Wales/England border (also see comment upon Figure 3.4 above).

4.9 No reference is made to environmental/social voluntary sector partners. CPRW has regularly been a consultee upon regional and national transportation plans, and was pleased to be invited to attend the Sewta seminar in July 2006.

4.12 3<sup>rd</sup> indent – CPRW looks forward to receiving an invitation to the projected seminar.

#### Comments on our analysis of the problems (Chapter 5)

5.4 1<sup>st</sup> sentence – is not appropriate to refer to older people as the elderly; they are individual citizens, not a category.

5.4 Final sentence – this ought to have ended, more explicitly: ‘...moving in the right direction toward decentralisation’.

5.5 (1<sup>st</sup> paragraph) 5<sup>th</sup> sentence – if the most could walk to school statement is correct, more effort needs to be taken to change school access habits.

5.6 (2<sup>nd</sup> paragraph) 3<sup>rd</sup> sentence – access by car to shops and leisure, where facilities are at a distance from where people live is more of a problem in respect of its contribution to global warming than it is to shoppers and leisure seekers, many of whom enjoy driving long distances.

5.8 (2<sup>nd</sup> paragraph) 3<sup>rd</sup> sentence – local concerns should be addressed by local action, including that of community councils.

5.9 (1<sup>st</sup> paragraph) Final sentence – the reference to lack of local rail services beyond Chepstow is cryptic. From west to east, it cannot exist within Wales because Chepstow stands on the Wales/England border; in the reverse direction, trains run to Maesteg.

5.9 (2<sup>nd</sup> paragraph) 2<sup>nd</sup> sentence – CPRW heartily endorses the strongly worded declaration that priority should be given to accommodating commercial over private road traffic. This said, it is highly desirable to promote increased carriage of freight by rail and water.

5.10 (1<sup>st</sup> paragraph) Final sentence – train unpunctuality can be an intermittent problem.

5.10 (1<sup>st</sup> paragraph) Final sentence - Chepstow and Abergavenny stations are prime examples of insufficiency of parking space, an issue that urgently needs to be addressed.

5.10 (2<sup>nd</sup> paragraph) 2<sup>nd</sup> sentence – it is strongly agreed that projects should not be implemented solely on the grounds that they assist car drivers to travel at maximum convenience and minimum cost.

5.12 (3<sup>rd</sup> paragraph) 4<sup>th</sup> sentence – who pays the price for works buses?

5.13 (3<sup>rd</sup> paragraph) 4<sup>th</sup> sentence – while modest extensions to out of town shopping malls might be acceptable, active discouragement should be given to the development of additional precincts. Assuming a factual basis for the somewhat sweeping statement that most of us use them, this should be regarded as an excellent reason for seeking to reverse the trend, and to persuade a greater proportion of the population to shop more locally. Patronage numbers would be illuminating.

5.14 (1<sup>st</sup> paragraph) 2<sup>nd</sup> sentence - should South East Wales attract a greater number of tourists in future, it will be important that a many as possible of them will be enabled to reach visitor attractions by public transport.

5.15 (3<sup>rd</sup> paragraph) 3<sup>rd</sup> indent – the laying of low noise emitting road surfacing material will improve environmental amenity.

5.16 The 1<sup>st</sup> paragraph embodies sound and persuasively-expressed reasoning.

5.19 (1<sup>st</sup> paragraph) It is noted that no reference is made to noise and vibration.

5.19 (3<sup>rd</sup> paragraph) 1<sup>st</sup> indent - does the term insulated correspond to the provision of hard and soft acoustic barriers?

5.20 (5<sup>th</sup> paragraph) 1<sup>st</sup> indent – to what is etc. intended to relate?

5.20 (6<sup>th</sup> paragraph) 2<sup>nd</sup> indent – the expression to be sensitive to visitors is not very meaningful. A more appropriate version would have been 'To serve the needs of visitors in a sustainable fashion'.

5.21 (2<sup>nd</sup> paragraph) 2<sup>nd</sup> indent – a clue should have been given as to the types of ecosystems that are particularly vulnerable to noise.

5.22 (2<sup>nd</sup> paragraph) 5<sup>th</sup> sentence – it is to be hoped that the introduction of the travel planning concept into the thinking of young people will be effectively filtered down to their parents.

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

Outcome F5 – CPRW supports inclusion of new outcome F5. In view of the traffic generated, it is very important that service and social facilities should be easily accessible by public transport.

Outcome N8 – the inclusion of new outcome N8 is endorsed. Without markedly changed attitudes to environmental impact on the part of the public, the environment will continue to be damaged, irreversibly in some instances.

#### Comments on our summary of problems (Paras 5.23 to 5.28)

A tentative view is expressed that drivers will not readily abandon their cars until driving (at least in un-congested areas) becomes a less pleasurable experience than at present and large-car ownership ceases to be a status symbol. This might result if the highest speed at which cars were capable of being driven was reduced, coupled with generally lower highway speed limits. Licenses should not be issued to people of under the age of 21.

#### Comments on the cornerstone of our strategy (Para 6.1)

The series of cornerstone statements is regarded with favour.

#### Comments on our objectives (Chapter 6)

6.3 Indent xi. – CPRW thinks that the objective should have been worded: ‘To ensure appropriate transport provision in connection with regeneration of town centres...’.

#### Comments on our approach to considering alternatives (Chapter 8)

The approach to considering alternatives is much appreciated for the uncompromising messages it relays. CPRW commends this chapter for its positive wording, as exemplified in paragraphs 8.7 (We will move...but we must start now.), 8.11 (will have to take practical steps), 8.13, 4<sup>th</sup> indent ( A massive road building programme cannot be a plan option).

Other comments on Chapter 8 are:

8.3 1<sup>st</sup> indent, final sentence – it is not understood what is meant by soft measures in relation to reducing traffic congestion and carbon emissions.

8.5 Final sentence – CPRW finds it difficult to imagine why it is necessary for Bridgend, Merthyr and Abergavenny to be more accessible to each other, though it is undisputed that sustainable access to these towns from their immediate hinterlands should be as convenient as possible.

Table 8.3 1<sup>st</sup> item – the statement that walking has a significant interchange role to play implies that a considerable time is spent in moving on foot from one service to another. Many people will find this inconvenient.

Table 8.4 1<sup>st</sup> item – CPRW is in strong agreement that road user charging cannot realistically be fiscally neutral if it is to act as a definite financial deterrent to use of the private car.

#### Comments on the list of actions we feel are needed (Chapter 9)

CPRW's comments upon the list of actions are:

9.4 Indent ix. – reference to construction of few new major roads; i.e. some, tends to contradict the noteworthy anti-road building arguments to be found in Chapter 8 (in paragraph 8.8, 1<sup>st</sup> sentence, for example).

9.4 Indent x.- improved street lighting must be of the environmentally-friendly type that minimises light spillage and energy use.

9.4 Indent xiv. – please see comments upon paragraphs 5.23 to 5.28 above with regard to motoring speeds, an important cause of accidents.

9.4 Indent xv. – freight carried on large vehicles should not be taken through residential areas and along minor country roads.

#### Comments on our monitoring proposals (Chapter 10)

No comments are made upon monitoring proposals, which are considered to be acceptable.

#### Comments on the general direction of our strategy

Comments upon Chapter 11 are:

11.10 Final sentence – Chapter 4, not Chapter 9, covers the consultation topic.

11.13 3<sup>rd</sup> indent – it is most important that necessary public transport provision benefits from planning obligations funding.

11.17/11.18 – CPRW is in firm agreement that the unfavourable effects of the 1985 Transport Act must be reversed by legislative means.

Have you any other comments?

## GENERAL

The respondent has found this to be a very clearly written and well organised paper, couched in readily comprehensible terms that are refreshingly free from jargon.

It is helpful that the contents lists include numbers for pages, section, appendices and figures – though tables are missing.

Paragraph numbering has been appreciated as an aid to response, also the numbering of paragraph clauses in Chapter 2. Sub-paragraphs, however, should have been given individual numbers.

The acronyms glossary is a useful addition, especially as some abbreviations are unsupported by their titles in the text.

## SPECIFIC

1.1 (1<sup>st</sup> paragraph) Final sentence – when is the draft RTP guidance expected to be issued in its final form?

1.4 CPRW would have liked to see this statement written as: ‘The WTS seeks to maximise the contribution sustainable transport can make...’.

Table 1.1 This is useful, but a more detailed interpretation is needed for the benefit of the non-expert reader. Against Accessibility, the Accession model is in need of an explanation.

1.14 Indent vii. – CPRW reiterates its desire to be invited to attend a stakeholder meeting.

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## Cardiff City Council      John Tumelty (Community Safety Design Officer)

Due to the potential wide ranging impact that the above mentioned document will have over the built environment, residential neighbourhoods, and other policy documents, it is important that a ‘Community Safety’ viewpoint is represented.

These points of view also support the obligations Local Authorities have to comply with Sec 17 Crime and Disorder Act 1998, and the more recent guidance provided in the Manual for Streets.

For the sake of convenience, the italic red text is intended to be included in full in the indicated ‘numbered paragraph’.

The text in green is by way of explanation only.  
Page 1 policy context.

- *Manual for Streets*

Page 3  
Social

- *Encourage the development of safe, secure and cohesive communities.*

Economic

- *Promote vitality and viability by designing in community safety.*

*Environmental*

- *Reducing the negative impact of crime generators, and areas where the potential impact of crime and disorder has not been considered.*
- *Encouraging movement which strengthens the integrity of neighbourhood identity, and supports the ownership and function of a space.*

1.5 Themes.  
Theme 1: To achieve a *safer*, more effective and efficient transport system

1.9 Target improved bus, rail, inter-modal and park and ride services  
*(to recognised nationally accredited standards)* provide real options and reduce dependency on the car.

**By way of explanation, the above input would refer to park & ride, cycle parking/storage facilities, and bus/railway stations, demonstrating how they have conformed to schemes such as the ‘Park Mark’ safer parking award scheme, the association of Chief police officers ‘Secured by Design’ award scheme, or other principles such as Crime Prevention Through Environmental Design (CPTED)**

Table 1.1 Sewta’s interpretation of terms in the RTP draft guidance

Term	Sewta takes this to mean
<i>Community Safety</i>	<i>To demonstrate how ‘Designing out Crime’ principles have been considered and applied, in order to improve the quality of life and sustainability of communities. To ensure Local Authority compliance with section 17 of the Crime and Disorder Act 1998</i>

Our Vision.

2.2. The term *‘Safety’* must be included as part of this statement, so that it can be more broadly explored within this document, and for the impact it will have on the priorities and following documents and policies.

RTP Priorities.

i. To *consider the impact of crime and disorder and to improve safety and* access to services, facilities and employment, particularly by public transport, walking and cycling.

Fig 2.1 To Change the outcome title ‘ Safety’ to *‘Safety & Security’*

5.8 Outcome: S5 (5) Improving the actual and perceived safety of travel

Although a statement is included that ‘Crime and the fear of crime is prevalent across the region’, none of the following bullet points address this issue.

- *Promoting and adopting guidance which demonstrates how the built environment can influence criminal behaviour.*

**This could be in the form of existing guidance such as the Cardiff Community safety ‘As Safe as Houses?’ guidance, or in a set of principles such as Crime Prevention Through Environmental Design (CPTED)**

5.20 Outcome: N6  
Add after final bullet

- *Encourage A-A routes (circular routes) which return to points of origin, rather than A-B routes that require transport back to point of origin or returning along the same route.*

### 6.3 Objectives.

The opportunity to include environments (roads through developments and parking locations) which have been designed from the outset to meet recognised standards which minimise the risks of crime is being missed.

The only reference to 'perceived levels of personal security' is wholly inadequate.

The objective should include reference to;

- *To create safe and secure environments and an improved quality of life for residents and visitors, whatever their choice of transport.*

### 8.25

In 2006 South Wales Police recorded 5326 theft of motor vehicles (3274 recovered), during a similar period within Cardiff the figures were 1738 reported stolen (584 recovered)

Insurance companies estimate that around one in twenty (5%) motorists on Britain's roads is driving without insurance, with an estimated 1.5 million untaxed vehicles on our roads (Speech by Transport Minister Dr Stephen Ladyman 05 October 2006).

DVLA have powers to clamp/remove/dispose of untaxed vehicles on adopted highways, currently only Swansea (unconfirmed) has devolved powers carry out such operations. Extending these powers to all Local Authorities/Police Forces within SEW area, will potentially fulfil the objective of reducing the number of vehicles on the road, and as these are most likely to be the most unroadworthy, also have a benefit for community safety.

Initiatives such as the increased deployment of ANPR (automatic number plate recognition) cameras (with a response capability) will also increase the amount of (higher risk) vehicles being taken out of circulation.

### 9.4.

xi. We will produce a regional car parking strategy to set a framework for existing local strategies and work with Local Authorities to improve parking control. ***SEWTA endorses both the 'Secured by Design' (SBD) and 'Park Mark Safer Parking' award schemes. The schemes offer a uniform approach to creating safer environments by providing high standards of security and good design.***

xii. Local roads will be managed with the intention of returning them to local people, pedestrians and cyclists, ***increasing local 'interest and ownership'***. The local transport system will be seen as a sustainer of the local community as well as part of a network for longer distance travel. The role of local roads will be redefined ***and will include an appreciation of features which 'design out crime' and create safer communities.***

xiii. Improved facilities and services for cyclists and pedestrians will be promoted to make walking and cycling a ***safe and*** real alternative for both local trips and part of longer integrated journeys by public transport, ***without impeding the 'defensible space of a neighbourhood.'***

Although Transportation is the principle theme of this document, crime & disorder is still woefully represented, and very few of the questions adequately offer any opportunity to address these important issues.

More information on the issues of walking and cycling, street design, framework, parking and accessibility, and the implications of crime & disorder are covered in the attached document 'As safe as Houses?'

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**Countryside Council for Wales**

**Martyn Evans (Regional Operations Co-ordinator)**

The document appears to be largely a preparatory document setting the scene for the future development of the Regional Transport Plan (RTP). We are aware of plans to produce a draft plan in October of this year. This date will coincide with the Environment Report produced under the Strategic Environmental Assessment (SEA)

requirements. We hope that in the meantime the SEA process is being used to shape the plan and the alternatives to be considered.

It is upon receipt of these SEA assessments that we will comment in depth as to whether we consider the most appropriate alternative has been chosen. We are slightly concerned that reference to this second stage of the SEA has been omitted from section 7 within the outline RTP as that is the crucial phase in terms of the SEA process influencing the production of the plan. However, we are aware of the plans to produce an environment report along with the draft plan and have therefore decided that the weight of our comments will occur at this stage.

With that in mind, there are some points that we feel it is worth making now to ensure that they are considered in the development of plan actions.

We note your comments in Appendix C with regard to the Habitats Regulations Assessment. While we note the approach outlined, we suggest that consideration of the sites and features likely to be affected by a transport plan ought to occur at the earliest possible opportunity in order to ensure that the RTP does not develop along the wrong lines. Habitats Regulations Assessment incorporates a strong element of the 'precautionary principle'. The plan maker should undertake a 'Test of Significance' in respect of the likelihood of significant effects to a Natura 2000 site. Where the likelihood of significant effects is unknown, the precautionary approach requires that 'appropriate assessment' be undertaken. The duty to undertake such an assessment, where significant effects are likely, is before an authority authorises/adopts the plan and it is an extremely difficult process to undertake retrospectively. Failure to undertake appropriate assessment (if required) would render the RTP open to legal challenge.

We are concerned that some of the tables are not referenced within the text. This leads to confusion over their inclusion and relevance to the text. Examples are table 3.15 and 3.16 on page 30. In addition table 3.12 seems to contradict the text in paragraph 3.16 stating that there is no data on modal split in South Wales, whereas in the table this data is presented per local authority.

We wish to see inclusion of the major impact on biodiversity through habitat fragmentation caused by the transport network in section 5.21. We would wish to see an action within the draft plan aiming towards increasing the connectivity of semi-natural habitats across the Sewta region through appropriate network maintenance.

We are surprised that an action on reducing the need to travel is not included within section 9, especially when considering that this is one of the key Wales Transport Strategy (WTS) objectives. We seek clarification on action 12 concerning the adoption of local roads by communities. This would have, possibly beneficial, effects on biodiversity but we would be interested to know more about the delivery of such an action.

We suggest that indicators and objectives ought to be SMART, and certainly measurable, in order to ascertain whether the plan is performing well against its set objectives. Whilst we accept that there are few longstanding data sets on this topic, the purpose of an RTP is somewhat undermined by statements such as the indicators 'are not attainable'. Comments such as those in 10.8 also have the potential to undermine the RTP process and the SEA monitoring programme that is also required.

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**Country Land & Business Association Wales**

**Mrs Taylor**

The CLA commends the document for its sensible, well-grounded approach for a long-term plan for providing a transport system which is sustainable for future generations.

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**Cowbridge with Llanblethian Town Council**

Comments on our fundamental principles (Chapter 2)

Incremental improvement to Valleys' Services to the extent of quadrupling current provision seems to contradict other principles concerning economic success as well as environmental issues. Shipping more people out of the valleys to work elsewhere instead of revitalising the local economy will not reduce transport dependence. It might

reduce car dependence, though this is an area of comparatively low car ownership. Rail transport is more sustainable than car but there would be social, environmental and economic costs, i.e. making the valleys even more dormitory in relation to Cardiff.

#### Comments on our vision (Chapter 2)

As above in relation to reducing the demand for travel.

#### Comments on our analysis of the current situation (Chapter 3)

Table 3.1 makes a strong case for action based on the nearness to capacity of the road system within Sewta. As resident of a small town with a rural hinterland, the inadequacy of rural public transport is a serious local issue.

The analysis of Cardiff Airport (3.11) concentrates too much on its advantages and not on the disadvantages which inhibit its development. There is no mention of the airport's lack of direct connection with any other mode of transport apart from cars, using an inadequate road system, though is briefly noted on p.72 ('access to airports is the main practical issue').

#### Comments on our consultation proposals (Chapter 4)

This is an excellent section revealing interesting input from stakeholders and members. The tables measuring satisfaction with services and especially those prioritising spending are revelatory of the perceptions of different age groups.

Of particular interest to Cowbridge is the high priority (No. 3, after road and pavement maintenance) allotted to town centre parking by young and old alike (page 43).

#### Comments on our analysis of the problems (Chapter 5)

Agree with analysis of access problems

Strongly agree with statement about improving connectivity within Wales and internationally. That there is at present 'no transport network to serve a networked city region' (p.49) let alone international links seems a tall order for Sewta. Can the transport system revive an entire economy? It's an exciting prospect anyway.

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

5.13 Endorse statement that LDP designated centres need good transport links and that regenerating town centres and supporting local communities are keys to this (p 51). Also accept the realism of the coexistence of out of town shopping centres. Both these commercial locations need to be accessible by public transport as well as by car, though both are heavily dependent on cars at present (apart from city centres) but small town centres struggle because of inadequate parking as well as not enough public transport.

5.14: 'improving access to key visitor attractions is much less important in SE Wales': disagree with this statement as e.g. the Glamorgan heritage coast

is a key attraction mainly accessible only by car as it is poorly supplied with public transport .

5.19: light pollution: possibility of timing some street lighting to go off earlier in low crime areas as well as the shielding proposed (p 55)

noise pollution: road surfacing is a factor as well as the need for insulation through screening e.g. Cowbridge by-pass is very audible as it raised above town and has a noisy surface.

Remarks on reducing the negative effects of transport on heritage, including town centres, and the encouragement of walking and cycling are welcome.

#### Comments on our summary of problems (Paras 5.23 to 5.28)

Very summary and modest but in reality major.

#### Comments on the cornerstone of our strategy (Para 6.1)

Agree strongly that building more roads is not a solution but that reducing demand through provision of better public transport and making the best of the current network is an achievable objective.

#### Comments on our objectives (Chapter 6)

Excellent, realistic and achievable

#### Comments on our approach to considering alternatives (Chapter 8)

The Preferred Plan strikes a good balance between what Sewta would like to do and realistic assessment of funding.

Approve strongly of 8.5 and its honest analysis of what is deliverable: the networked city region gets put in its place as aspirational towards the fairer and more sustainable society WAG envisions. There's nothing wrong with vision so long as it doesn't create unrealistic expectations of a plan such as this. This document resists rhetoric and is clear about what the transport options can achieve in the Long Run, and it is going to take a long time. Changing public attitudes is key to success.

#### Comments on the list of actions we feel are needed (Chapter 9)

Radical reallocation of funding away from road building into other assets is a good starting point.

The actions are a mixture of intentions that could be put into play starting from now e.g. applying joined up thinking to bus schedules (iv) and more ambitious aims like a much improved integration of the transport system (iii). This makes this list seem practicable because it is already doable in part, and in a way that builds towards the more ambitious structural changes.

Would like to know more about how community transport can be improved and expanded; approve strongly of improving condition of roads under local authority control as well as the idea of a road hierarchy which returns local roads to local people, pedestrians and cyclists. Also the need to integrate land use and transport the planning processes.

#### Comments on our monitoring proposals (Chapter 10)

Comments on the expense and questionable value of some elements of WAG guidance to RTP monitoring seem eminently sensible. Sewta's proposed monitoring framework (10.11) which emphasizes the importance of an all-Wales strategy makes sense both in terms of benchmarking and comparative monitoring as well as in fostering the long term benefits to the Welsh economy of joined up transport planning.

#### Comments on the general direction of our strategy

This document clearly takes seriously:

- the need to better use and develop the current transport system so that road building resources are deployed more sustainably
- the wide ranging social, economic and public health implications of transport policy
- the need to involve a wide spectrum of society in shaping the transport system of the future
- the need to address the problems of carbon emissions and climate change as a matter of urgency

#### Other comments

The above is a non-technical response to what is in part a technical document. The writers are to be congratulated in making most of it accessible to a non-technical readership. Our responses have been given with our own area (a market town serving a rural hinterland) very much in mind. We note (11.11) Sewta's intention to 'work with local communities and interest groups to ensure that policies and proposals effectively respond to their concern and priorities' (p.80) and we look forward to being kept in touch with the evolution and, we hope, the achievement of the RTP.

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**Friends of the Earth      John McCrory**

Your objectives reflect the importance of reduced carbon emissions, the pointlessness of building more roads to relieve the problem, the need for an attitude change towards car usage, and the need for an increased investment in

public transport, walking and cycling. Also noted is the intention to reduce social exclusion of those who are car-less or disconnected by some other means.

Cardiff Friends of the Earth would like to emphasise the importance of prioritising pedestrian, cycling and public transport access above car access and of reducing car dependency. The current attitude in Cardiff towards cyclists and pedestrians is very poor. It is clear from recent constructions, e.g. St Davids 2, that the council planners need to adopt a new mind-set when planning new developments so that pedestrians and cyclists are no longer placed on the fringe and effectively treated as second class citizens.

It will take some hard effort but we wish you every success in achieving your objectives. We sincerely hope that your document represents more than a passive statement and that your objectives will feed strongly into any walking and cycling strategies, city centre strategies, community strategies and corporate strategies that Cardiff County Council produce. The recent evaluation and feedback on the Cycle Strategy by the Environment Scrutiny Committee is a promising improvement. It is important that Cardiff Council adequately consults with the public and listens to the feedback when making plans. Their approach to the consultation process appears to be somewhat dubious at present.

We particularly support the construction of a pedestrian/cycling bridge across the river Ely to connect Cardiff with Penarth. The desire for this among the people of Penarth and Cardiff has recently been evidenced by the demonstration on 22 April which saw more than 300 cyclists ride across the Cogan Spur.

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**Newport Transport Ltd**

**Trevor Roberts**

Comments on our fundamental principles (Chapter 2)

Whilst paying "much more attention to the problems of social exclusion" the big wins are going to revolve around the bigger questions surrounding mass movement. High volume high density. This will have the greatest effect. Integrated land use planning is critical and has to start soon with Planning Committees being less divorced from the real and worry less about local pockets of objection which creates a completely parochial approach and ignore the wider problems.

Comments on our vision (Chapter 2)

A modern integrated and sustainable transport system can only be created in partnership. Local authorities have to stop worrying about pleasing the car lobbyists, the parking phenomena of wanting to park right outside every shop or office (ie no walking at all) and really enter serious policies of co-ordinating transport flows. This can only be done by engaging all parties in consultation.

Comments on our priorities (Chapter 2)

Whilst trying to provide a "public transport system" it would help significantly if local authorities consulted, listened and took on board transport providers comments and concerns. Just ignoring them and building roads and town centres that aren't "fit for purpose" will make providing "a public transport system" much more difficult. Access to new centres, estates, business parks is critical so a road network for public transport is vitally important.

Comments on our analysis of the current situation (Chapter 3)

Seems to reflect the general perceived position.

Comments on our analysis of the problems (Chapter 5)

Analysis is only the first step - some of the methods for "attacking the problems" seem weak and incapable of being really implemented. The public has too much choice - how do you take that away or restrict in a modern era?

Comments on our summary of problems (Paras 5.23 to 5.28)

Perhaps better investment, less commercialism (like European Countries) would achieve greater breakthroughs. The Police seem unable or unwilling to get involved in transport safety and along lines of major public transport routes. Estate vandalism appears out of control and unchecked.

#### Comments on the cornerstone of our strategy (Para 6.1)

Agree in principle.

#### Comments on our objectives (Chapter 6)

As a generalism do not make public transport "tailend charlie". If new town centres built - plan in access by public transport. If new housing estates built - section job and road penetration is vital. Don't build public transport out of the equation and then say it needs improving. Front end priority is the key.

#### Comments on our approach to considering alternatives (Chapter 8)

Provision of funding obviously important.

#### Comments on the list of actions we feel are needed (Chapter 9)

All very welcome but only if Sewta is able to take all the local authorities along with them. Local authority parochialism is stifling initiatives and developments. A wide regional transport consideration is needed.

#### Comments on our monitoring proposals (Chapter 10)

None - a necessary development requirement.

#### Comments on the general direction of our strategy

The strategy is to be welcomed and commended. Finance, co-ordination, partnership and decreased parochialism are vital if many of the issues are to be tackled seriously. I'm sure the pursuance of these strategies will lead to improved "transport system/infrastructure" facilities generating greater wealth and prosperity for South East Wales.

#### Other comments

Thank you for the chance to comment and be part of the future plans. I think this is one of Sewtas greatest strengths.

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## **Passenger Focus                      Simon Pickering**

#### Comments on our fundamental principles (Chapter 2)

Passenger Focus welcomes the commitment to developing a Transport Strategy that extends beyond traditional transport policy pre-occupation of providing increased road capacity, the 'predict and provide' approach, to addressing wider social and environmental concerns. As such, we fully support the fundamental principles that have been identified.

#### Comments on our analysis of the current situation (Chapter 3)

The section contains a great deal of good information. It would be further strengthened by including additional information about journeys, particularly using public transport, that are not wholly within the Sewta area. For example, the Nation Rail Trends Yearbook 2004/05 (<http://www.rail-reg.gov.uk/upload/pdf/294.pdf>, p. 86) shows that arterial rail routes are of growing importance to Wales. Rail trips between Wales and nearly all the English regions have shown strong growth in recent years, including: London (up 28% compared with 10 years ago); South West (up 50%); North West (up 28%) and West Midlands (up 50%).

#### Comments on our consultation proposals (Chapter 4)

Passenger Focus welcomes the inclusion of Table 4.1 based on the results of our National Passenger Survey (NPS). It is worth noting that this data is now available exclusively for the Sewta region, rather than just for the entirety of Arriva Trains Wales' services. This can be supplied on request. Passenger Focus is also currently conducting some additional research into rail passenger priorities within Wales that may be useful for the regional transport plan.

#### Comments on our analysis of the problems (Chapter 5)

Outcome S5 (5) identifies personal security on public transport as an area of concern, which is further evidenced with regards to rail travel by the NPS, but does not suggest any activities that specifically address these concerns. Passenger Focus would like to see the safety/security concerns of rail passengers addressed, potentially through partnerships with the British Transport Police and/or Arriva Trains Wales.

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

Passenger Focus supports both of these outcomes.

#### Comments on our summary of problems (Paras 5.23 to 5.28)

A potential additional problem could cover the limited knowledge of the availability of public transport and how to access/use it.

#### Comments on our objectives (Chapter 6)

Similar to above, a potential objective could cover marketing/promotion activities designed to promote knowledge and understanding of the availability of public transport and how to access/use it.

#### Comments on the list of actions we feel are needed (Chapter 9)

Passenger Focus welcomes and endorses the actions related to the rail network and integrated transport. Again, we would welcome a commitment to promoting a better understanding of the role and value of the public transport network. Also, consideration should be given to an activity that articulates the need to work with other consortia and/or partners to meet a number of the objectives.

#### Other comments

A number of strategic rail issues in Wales, such as reducing North-South Wales journey times, will need to involve more than one consortium. While the current document does make some references to such collaborative working (eg sections 4.9 and 5.9), it would be beneficial to see this more explicitly articulated in some of the more action oriented sections of the plan. Passenger Focus notes the references to the importance of Sewta's partners in delivering the regional transport perspective. We acknowledge our responsibility in the regard, and look forward to working with Sewta in the future.

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## **Penarth Town Council    Mr E Vick, Town Clerk**

#### Comments on our fundamental principles (Chapter 2)

These are supported.

#### Comments on our vision (Chapter 2)

This strongly supported as the Town Council is of the opinion that traffic congestion and growth can be tackled only by a set of integrated transport measures.

#### Comments on our priorities (Chapter 2)

These are supported.

#### Comments on our analysis of the current situation (Chapter 3)

The analysis of current conditions is noted.

#### Comments on our consultation proposals (Chapter 4)

No particular comment is expressed other than to say that the Town Council wishes to continue to be involved in the process as a consultee.

#### Comments on our analysis of the problems (Chapter 5)

In considering the problems in Sewta against the outcomes listed in the WTS, the Town Council supports the two additional outcomes F5 and N8. The Town Council strongly believes that transport measures which encourage local employment opportunities are important for sustainable local communities. Where large out of town developments take place, developers should be required to contribute to appropriate transportation systems as often their location means there is no alternative to the car. It is insufficient for developers simply to contribute to highway improvement schemes in an attempt to ameliorate the consequences of increased traffic as a result of such developments.

As a means of improving access as well as changing public attitudes, the Town Council supports the concept of a subsidised transport pass scheme for younger people (possible under 25 years) to encourage greater use and familiarity with public transport systems. As a consequence more funding needs to be made available to enable subsidised transport to be expanded. Generally, the Town Council share the assessment of the main problems listed in paras. 5.23 - 5.28.

#### Comments on our objectives (Chapter 6)

The cornerstone of Sewta's strategy as set out in para 6.1 together with the objectives in para. 6.3 are supported.

#### Comments on our approach to considering alternatives (Chapter 8)

The Town Council supports the view that a 'do nothing' or minimum approach is not an option. Therefore, the aim set out in para. 8.24 is supported.

#### Comments on the list of actions we feel are needed (Chapter 9)

In considering what the RTP is likely to contain the Town Council is in strong agreement with actions xii and xv contained within paragraph 9.4. However, in relation to the latter it is felt that there should be a greater commitment to limit and control freight on the road through transfer to rail. This is a priority which needs to be greatly enhanced.

#### Comments on our monitoring proposals (Chapter 10)

No comment is expressed.

#### Other comments

On a localised issue in terms of the rail network, the Town Council considers that: a)The capacity of the Cogan Junction Spur needs to be increased; b)The railway line into Penarth needs to be duelled; c)A new station is needed to service the Penarth Marina and Haven area. It is the Town Council's view that this is one of the busiest rail junctions on the local rail network, often used by inter-city trains diverted from the main line, which required significant investment given the east/west road traffic corridor between Cardiff Bay and the Vale of Glamorgan.

### Comments on our fundamental principles (Chapter 2)

I welcome the Plans. It was long overdue and I sincerely hope it tackles the serious transportation problems affecting our valleys regeneration and our employment opportunities.

### Comments on our vision (Chapter 2)

I regret that there is no mention of re-establishing the railway line from Maesycwmer to Newport via Bedwas Trethomas and Machen. Thereby relieving the long queues on the lower RV bypass.

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## **Railfuture John Rogers (Vice-chairman of South Wales branch)**

### Comments on our fundamental principles (Chapter 2)

2.1 last bullet point : delete "in the Valleys". 5th bullet point : add "public" to "fully integrated \_\_\_\_ transport system". 6th bullet point : after "rail" add "(Including light rail/train)". Otherwise sound principles/thinking.

### Comments on our vision (Chapter 2)

2.2 Fine but perhaps preface this with "Working closely with the Assembly government"... After all, the WA has a statutory duty to operate policies for sustainable development... and should (at least) co-ordinate the activities of Sewta and similar. (4.9 noted!)

### Comments on our priorities (Chapter 2)

2.3 Fine... freight by rail (and water)? (Page 74 xv noted)

### Comments on our analysis of the current situation (Chapter 3)

Good. 3.5 journey times by bus...classic example is 244 Bridgend-Pontypridd...look at route and overall time" Also why oh why no public transport links (bus) from Nantymoel (A4061) over Bwlch y Clawdd to TREORCI? Nearest station to Nantymoel is probably Treorci, plus the bustling shops, cinema etc there! 3.9 Roads with no pavements! eg busy A4061 Blackmill-Bryncethin. 3.12 Why no analysis of rail provision in the ports? (3.28 noted) 3.20 26% of Welsh households no car: significant!

### Comments on our consultation proposals (Chapter 4)

No. Seems adequate though.

### Comments on our analysis of the problems (Chapter 5)

5.7/5.8 Government should accept that no new road should be built nor any major scheme sanctioned (eg widening) unless pedestrians have provision & cycle tracks provided. 5.10 Effective analysis and highlighting of problems! Last para: central government must tackle this.

### Comments on our additional outcomes F5 and N8 (Chapter 5)

5.13/F5 : A knotty one! I often use public transport but not easy for weekly supermarket visit because of quantity/weight or goods bought. Town centres: where there are perceived to suffer from out of town centres (eg. McArthur Glen) could not rate reductions compensate (with WAG financial support)? 5.22/N8 : Excellent analysis, comments and proposals. Sewta alone cannot do this. Public transport must be seen as attractive (lots of definition) before propel will use it instead of the car. Virtually no lead from London in this direction...eg stopping tram schemes (Liverpool eg). This axis must be Brussels - Caerdydd.

### Comments on our summary of problems (Paras 5.23 to 5.28)

Ok but 5.25 not adequate. Many kids don't experience public transport, especially rail. Many people like the car as it 'insulates' them from the 'masses'... Bus journey lengths deter; rail prices deter; overcrowding deters...

#### Comments on the cornerstone of our strategy (Para 6.1)

3rd bullet point : why not local ????? Prefer a specific pledge to the potential locked in closed railway routes eg Beddau, Garw valley...use of light rail in Cardiff... 4th bullet point : not sure I understand this!

#### Comments on our objectives (Chapter 6)

6.3 Excellent. Add working with WAG to promote freight by rail/water?

#### Comments on our approach to considering alternatives (Chapter 8)

8.1 Page 63 : 3rd block down (carbon emissions). Excellent! 8.3 Preferred plan...sound thinking. 8.5 Opening sentence, yes, indeed! \*.8 Excellent. Scope for more rail re-openings too. Page 71 : RAIL. Freight. Sewta suffers from Irish Sea road traffic... so need greater use of rail for freight to and from Ireland. TRAM : Much potential for Cardiff (at least)! COACH : vital role in filling rail gaps...eg Carmarthen-Aberystwyth, Merthyr-Brecon). 8 Good overall!

#### Comments on the list of actions we feel are needed (Chapter 9)

Page 74 RAIL : RAILFUTURE Wales (R'way Devel. Society, Wales) has a comprehensive development plan for rail...hard copy or website [www.chartist.demon.co.uk/rdsw/rdsindex.htm](http://www.chartist.demon.co.uk/rdsw/rdsindex.htm). Overall excellent section/chapter.

#### Comments on our monitoring proposals (Chapter 10)

No, good chapter.

#### Comments on the general direction of our strategy

I am impressed and greatly encouraged...there is sound vision and a realistic set of proposals. This sort of thinking is long overdue! I trust other parts of Wales enjoy the same...

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## **Railfuture Rowland Pittard (Branch Secretary)**

1.13x1 We welcome cross border consultation but this should also be for all modes of transport not just rail. We also consider that Sewta should work with the other transport consortia and also with adjacent border counties. We noticed the lack of awareness of Sewta to the recent reduction of rail services at Severn Tunnel Junction and between Cardiff and Bristol some of which have still not been reinstated. We are also concerned at the lack of coordination of services to Brecon and Mid Wales from the Sewta area.

1.14v11 We welcome being involved in further consultation.

#### Comments on our fundamental principles (Chapter 2)

2.1 We strongly support your fundamental principles and would add that seamless affordable travel with good interchanges and through ticketing should be included.

#### Comments on our vision (Chapter 2):

2.2 We consider that the word "all" should be inserted before people.

#### Comments on our priorities (Chapter 2)

2.3 We consider that the provision of travel information at point of use is essential and should not be dependant on a mobile phone. We consider that there should be a step change in the quality of local trains and buses to encourage greater use.

#### Comments on our analysis of the current situation (Chapter 3)

3.1 We are concerned about the increased journey time created by congestion and road works where delays of up to 30 minutes are not uncommon

There are extended road works on the M4 north of Cardiff and on some main valley roads. New developments should not be allowed to create more traffic problems especially where they take place away from public transport provision. There should be greater reliability to ensure that the bus does meet the train and is not held up by congestion and road works.

3.7 We question the value of your survey. Some bus stops have a very infrequent service with no service on Saturdays, Sundays Bank Holidays and evenings. Some rail stations have only an hourly service and none on Sundays. One rail station Pyle only has a two hourly service while Chepstow only has 2 trains every 3 hours.

3.9 The % figures for footpath obstructions are available authority by authority and should have been included in a tabular form in the Outline. We are concerned that many direct footpaths to facilities are being diverted for housing and other developments with no consideration being given to the users and lack of control by authorities.

3.12 You do not mention passenger travel by sea. There is a new passenger berth on the River Usk at Newport and passenger vessels call at Penarth, Barry and Porthcawl. This could be further developed. There is also river transport in Cardiff Bay.

Tables It would have been helpful to have included population statistics in the tables. We are also concerned that cross border journeys are not included e.g on page 27. Are we to assume that the tables on pages 29 and 30 include cross border travel?

3.30 We wish to point out that Social exclusion is not just caused by low income. It can also be caused by the inability to drive especially for younger and older people and the absence of good transport services adjacent to place of residence. Poor evening and weekend services also cause exclusion in some areas especially for communities with no Sunday and Bank Holiday services.

#### Comments on our consultation proposals (Chapter 4)

4.1 We appreciated participation in your original consultation

4.8 We note that rail fares are now being adjusted 3 times a year with small incremental increases which when aggregated over a few years are substantial especially from Cardiff to Maesteg, Abergavenny and Chepstow. The fares are not cheap when compared with the conurbations of London, Birmingham, Newcastle and Glasgow and also in South and West Yorkshire. Many local authorities give free or concessionary rail travel to the over 60s. Are people satisfied with buses because they are free?

4.9 We are concerned that no user forums have been set up by Sewta or by the local authorities although some authorities did indicate that they would do so as part of their Community Strategy work. We are concerned that some local authorities have not followed through their initial proposals for transport forums with some e.g Bridgend even indicating that these should be organized by Sewta. We would be interested to know what your plans are for user forums

4.12 We wish to be involved but would query the statement 4.15 about the level of consultation.

#### Comments on our analysis of the problems (Chapter 5)

5.1 We were not consulted but strongly support the view that is expressed in 5.24. We consider you have not highlighted the problems of poor information about timetables and fares, frequent changes of services and operators, lack of links between bus and rail services, unreliable connections, poor facilities at bus stops and stations, lack of real time information, poor quality trains and buses and much more. You also have problems of lack of awareness between local authorities and also with Welsh Assembly Government with different priorities. We have seen changed priorities instead of implementing your initial plan for service improvements (The Red Book) that were

originally approved by the Assembly. Changes of priority are not helpful for long term planning although they may be created by external influences such as National Government announcements such as developments at St Athans.

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

5.3 Regeneration of town centres will have to include excellent transport from the surrounding area or the provision of large car parks

5.22 Car users must not be priced off the road until a comprehensive public transport system is in place. There must be financial incentives to encourage people to use public transport. Increasing train fares especially for long distance journeys by rail is not helpful.

#### Comments on our objectives (Chapter 6)

6.3 We support your objectives but also consider that cross border and through travel should also be recognized and provided for. The Sewta area is the link between West Wales and England and good West- East provision is required especially for rail services.

7 We acknowledge the legislative need for Strategic Environmental Assessments and consider that such aspects as the effect on the heritage, leisure facilities and public rights of way should be included.

#### Comments on our approach to considering alternatives (Chapter 8)

8 Table 8.3 raises many questions because the opportunities are not clear. If the main aim is to reduce road transport a much better public transport system is required with improved rail and bus frequencies (at least every 15 minutes) a level at presently enjoyed by services to Barry, Bargoed, Penarth and Pontypridd. We do not support guided busways which require considerable investment and a large land take but we do support light rail in the larger conurbations and for some interurban routes. Our proposals for Light Rail are included in our recent Development Plan. More freight could be transferred to rail.

#### Comments on the list of actions we feel are needed (Chapter 9)

9.4 We consider the 'actions for the future' are commendable but will require considerable investment. We trust that the priorities of the Rail Strategy are maintained with those promised in the original plan for 2005-7 (the Red Book) for half hourly services to Maesteg, Merthyr and Rhymney implemented as soon as possible.

#### Comments on our monitoring proposals (Chapter 10)

10 We note that some of your recent monitoring has been selective and not extensive. Your "journey time to Cardiff survey" only concentrated on the Cardiff Valleys and not the other less well served areas.

#### Other comments

11 We consider a main weakness to be the dependence on Network Rail for costly rail infrastructure improvement schemes. We also consider another weakness is the lack of power over train operating (except ATW) and train leasing companies. We did suggest in consultation for the Transport Wales Act that WAG take over the rail infrastructure. Sweta has no control over First Great Western Trains and Virgin Cross Country and West Coast Mainline. GWT have even permanently withdrawn services and now frequently cancel services in Wales. There is also little control over bus operators whereas in London they all work to a service specification.

11.10 You do not include voluntary groups in your list of stakeholders. There is an obvious need to bring the work closer to the user especially the disabled, the young, the old and visitor organizations. We urge you to consider a better working relationship with users. Many of your stakeholder representatives and local authority officials do not use public transport. Even some council transport department offices are a considerable distance from bus stops and railway stations eg Blaenau Gwent, Bridgend and Caerphilly

11.19 We would support this action. Who monitors the rail provision on behalf of Sewta?

We believe that the no growth franchise concept was flawed and the DfT should revise its funding to WAG for the franchise. DfT has gained 1.2 m pounds from GWT who now operate their South Wales services with one less HST set.

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## South East Wales Economic Forum

### Introduction

The Sewta document provides the context, background analysis, and initial proposals for the Regional Transport Plan.

### Structure and style

1. The initial document is comprehensive, detailed, and thought-provoking. However, its structure makes for a difficult read, and subsequent lack of clarity in following the key arguments and conclusions. The final report might benefit from a simpler, cleaner, structure – providing less detailed analysis and emphasis on problems, and linking chapters on Vision, Strategies, Ambitions, Objectives, and Proposed Actions.
2. The report also tends to replicate the national transport strategic vision and priorities, rather than interpret it within the context of South East Wales.
3. It could be useful to consider summarising the regional issues under the headings economic, social, and environmental. This would assist in the development of the regional vision, priorities, and objectives, which could be based on the opportunities that could be beneficially exploited.
4. The document strongly advocates the overriding importance of tackling global warming through a “green” regional transport policy. This is a legitimate objective, and the arguments advanced in many ways makes the document a more interesting read. However, the downside is that the document has a tendency to be polemical, and addresses issues beyond its scope. Comments such as:

*“There is a possibility (unquantified as yet) of the tundra melting and destroying all life on Earth.”*

and...

*“We can drink fine wine but they will have to come increasingly from Europe not Australia or Chile. We can enjoy holidays in the sun but they will have to be reached by train in Southern Europe not plane in Mauritius.”*

or when referring to car usage...

*“...we need to return the situation to what it was in the 1970's and 1980's.”*

...can unreasonably colour the reader's understanding of the ultimate conclusions of, and proposals in, the Plan.

### Main proposals and conclusions

#### Positives

5. There are a significant number of positive proposals and conclusions in the document, that also align with SEWEF's Development Strategy. These include:
  - the development of an integrated Transport Plan for the city region;
  - improving accessibility to employment, leisure, and other facilities, and in tackling social exclusions and regeneration; and,
  - “protecting” the economic interest of the freight industry.

### *Overall concerns*

6. The document would benefit from being more positive. It currently seeks to define and address issues as problems without articulating what opportunities could be exploited.
7. The major concern, however, is that there is no clear vision or strategy permeating the document, which recognises the role that a Regional Transport Plan could play to improving the economic competitiveness of the South East Wales region in a global economy. There is mention of the need to improve external connectivity, but it appears to be a peripheral, not a core objective. Similarly, the internal connectivity discussion tends to focus on issues such as restricting movement, or reducing dependence on the car. Whilst these are important and relevant issues, a more challenging debate is needed on how we can aspire to a modern internal integrated transport system for the 21<sup>st</sup> Century.

### *SEWEF Development Strategy – Connectivity*

8. The SEWEF Development Strategy contains a chapter on connectivity as a core driver of economic competitiveness. There are a number of issues and proposals raised in that chapter which could assist the development of a more balanced and comprehensive Regional Transport Plan; one that could help drive forward the economic competitiveness of the region, and address the problem of regeneration and social exclusion. These include:
  - a recognition that the road network is crucial, to economic competitiveness, and that unusually a single key route has a pervasive effect on the region's economic performance – the M4. This argues for the need for selective highway investment to improve competitiveness, as well as tackle social exclusion;
  - investment in the road network in the United Kingdom, generally, is significantly below that of almost all the countries in, for example, Continental Europe. The quality of the South East Wales road network needs to be incrementally enhanced. In particular, the M4 must not change from being a facilitator of growth to being a barrier. There also remains the need to anticipate and address “bottlenecks”, and provide strategic access to potential new locations for businesses;
  - investment in public transport needs to be sufficiently major to fundamentally enhance the image of the entire region. Given the long lead times, a clear argument could be made for beginning now the process of planning for new modes of transport such as demand-responsive rapid transit systems;
  - genuine intermodal smart card region-wide ticketing systems should be advocated. This should cover not only all public transport (including taxis and mini-cabs), but also car parking, and, when appropriate, road pricing, together with real time information on services for passengers;
  - the advocacy, with partner regions, of the need for faster and more reliable rail services to London, direct rail links to Heathrow, and re-connection of Southern Wales to the cross-country Intercity rail networks; and,
  - measures, in association with ABP, to increase short sea shipping and container traffic from local ports.

The South East Wales Development Strategy also recognises that significantly improved transport linkages up and down the Valleys are important, not only to provide better workforce catchment areas, but are also critical to encouraging people to relocate and live in the Valleys areas. This is vital to regeneration efforts, and should be recognised as an objective within the proposed Regional Transport Plan.

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## **South Wales Police      Detective Inspector Steve Trigg**

### Comments on our fundamental principles (Chapter 2)

It is interesting to note that the first fundamental principle includes "concerns about public safety and security", whilst the second includes the need to "Pay much more attention to the problems of social exclusion related to transport than hitherto." And I agree that the principles are appropriate and relevant.

In the light of the Fundamental Principle of the Plan and the, 'Making the Connections' agenda, I would ask that the level of attention paid to Crime, Disorder, Safety and Security within the document be reviewed.

#### Comments on our vision (Chapter 2)

The Vision appears appropriate for the plan - I would contend that by addressing crime and disorder issues, that sustainability is also being addressed.

#### Comments on our priorities (Chapter 2)

The priorities are relevant and appropriate.

#### Comments on our analysis of the current situation (Chapter 3)

Whilst the fundamental principles of the document have recognised both concerns about public safety and security as being important, surveys have also identified safety as a concern to users (3.8). There is no data on the levels of crime and disorder occurring on the transport systems in Sewta from Home Office Police forces, British Transport Police, Community Safety Partnerships or transport providers, neither is there such data from surveys.

The Welsh Assembly Government and Department of Transport - Manual for Streets, stresses the importance of the need for multi-agency impact assessments, and of including community safety data, whilst the Department of Transport's Putting Passengers first (Page 31) states that a key to improving the quality of service is "Passengers need to feel safe on buses, particularly at night".

I would suggest that of specific importance are:-

1. The level of disorder against the person, whether it be staff or users on the transport system;
2. The level of damage against the transport infrastructure;
3. How safe people feel on the Sewta area transport systems;
4. The level of car crime - which is particularly high in Cardiff when compared to the rest of the UK and on which transport planning has a large impact;
5. The levels of the above issues in relation to surrounding areas and the UK as a whole.

These data would be either immediately available or could be collected if it was felt appropriate. This would allow the levels of crime, disorder and safety on the transport system as well as the likely outcome of these issues on usage of the system to be considered.

#### Comments on our consultation proposals (Chapter 4)

The chapter shows that Safety and security are important (4.3) that safer and stronger communities are regarded as the third highest priority amongst stakeholders (4.4), and that satisfaction with personal safety on train stations and trains in south Wales is below the national average.

The Sewta partnership is made up of representative from Local Authorities and as these authorities are responsible for the plan I would suggest that like the individual authorities, Sewta has an obligation to consider Section 17 of The Crime and Disorder Act, and how its plans and strategies will affect crime and disorder.

Details contained in the plan, will undoubtedly have a resource implication both for British Transport Police and the Home Office Police forces eg - policing parking and traffic restrictions and patrolling any new transport infrastructure.

One of the key messages in the Wales Transport Strategy (page vii) is:- 'Safety - by improving the perceived and actual safety of more sustainable modes of transport and interchange facilities, the overall levels of access to key services and facilities is increased.' This is reinforced by the WTS emphasising that "Ensuring that people can travel in safety is a fundamental aspect of our Transport Strategy".

Given these facts, strategically as well as tactically I would suggest that it is important to include Community Safety practitioners and in particular trained police Architectural Liaison Officers amongst those consulted on both strategic and tactical issues.

- Strategically - they can advise on the likely implications of policy decisions on regional and local levels of crime and disorder.
- Tactically - "To ensure that crime prevention considerations are taken into account in the design of layouts it is important to consult police architectural liaison officers and crime prevention officers, as advised in 'Safer Places' " (Page 46 Manual for Streets)

#### Comments on our analysis of the problems (Chapter 5)

The chapter contains an outcome at 5.8 that relates to "Improving the actual and perceived safety of travel". Whilst the second paragraph states "Crime and the fear of crime is prevalent across the region.", and also states that "Personal security on public transport concerns many,..." This is not addressed in the methods used to tackle the problems. Further, at 5.25 one of the main problems is identified as, "People see the Transport system as being unsafe."

Whilst I could suggest bullet points to be added to 5.8, I would ask that Sewta consider raising crime disorder and safety on the transport system as well as ways of reducing it as a specific consultation issue.

In particular I would ask that consideration be given to the Government Office for London sponsored document "Secure and Tranquil Travel - Preventing Crime and Disorder on Public Transport (link <http://www.willanpublishing.co.uk/cgi-bin/indexer?product=0954560744>), an invaluable resource for those seeking to address Crime and Disorder on public transport, be considered when strategic and tactical options and outcomes are debated by Sewta. (Police Architectural Liaison Officers will be able to assist).

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

F5 Architectural Liaison Officers have a specific interest in this Outcome. Increasingly concern has been raised over strategies that rightly attempt to discourage car usage (reducing car parking) in favour of the use of public transport, but with available public transport not a viable option. This has led to tensions with car users parking as close to their destination as possible, often parking illegally unsafely or inappropriately, with complaints being made to the police as a result.

N8 No specific comments.

#### Comments on our summary of problems (Paras 5.23 to 5.28)

As stated, 5.25 raise the issue of an unsafe transport system but actions to address the issue are sparse.

#### Comments on the cornerstone of our strategy (Para 6.1)

These issues are appropriate. It is noted that one of the cornerstones is to: Provide safer Neighbourhoods for people to live in and walk and cycle.

#### Comments on our objectives (Chapter 6)

I would ask that consideration be given to point v. being changed from:

- To improve actual and perceived levels of personal security when travelling

To:

- To reduce actual and perceived levels of crime and disorder on the transport system and in particular address those issues that affect the personal safety of those using and working on the transport system.

#### Comments on our approach to considering alternatives (Chapter 8)

The police in particular and those dealing with Community Safety issues in general are likely to be affected by any alternatives suggested. Furthermore, such practitioners can assist in bringing about behavioural travel changes both by enforcement actions as well as in educating the public.

Again I would suggest that involving Community Safety practitioners more actively within Sewta may bring benefits.

#### Comments on the list of actions we feel are needed (Chapter 9)

There are no specific actions related to improving security and safety on the transport system. I feel that this is a major omission, and as discussed above, crime and disorder issues are largely omitted from the analysis for the report, and consequently to not feature in the 'likely actions'. This omission should be addressed and I would welcome and opportunity to assist Sewta in this area.

#### Comments on our monitoring proposals (Chapter 10)

It is interesting to note the concerns raised by Sewta on the monitoring framework issued by the assembly. I would agree that any monitoring should be SMART.

#### Comments on the general direction of our strategy

Specifically:

1. In respect of 11.8 of the Outline of the Regional Transport Plan, that identifies specific challenges for the RTP in relation to the interface between Council community strategies. I believe that the RTP can not only influence, 'community strategies by indicating local policies and schemes that are consistent with the regional strategy', but also act as the conduit for cross authority co-operation.

An example of this might be park and ride systems connected to the rail and bus services in the Local Authority areas surrounding Cardiff to cater for commuters from these areas. This would not only reduce road travel, but would also impact on the large amount of car crime resulting from off street parking around Cardiff city centre. The resultant improvements in the infrastructure would also impact on peoples feeling of security on public transport thereby increasing usage.

2. Strategic decision in relation to controls exercised over roads in S.Wales will have a large impact on police resources. Enforcement, introducing charging, decriminalising parking, enforcing existing and new traffic regulations and ensuring speed limits are adhered to will all need to be 'policed'.

I would suggest that strategic decisions in relation these issues would benefit from a police input.

3. The Regional Parking Framework - Car crime and anti-social behaviour resulting from car parking has a resource implication for police forces. Furthermore, "Car parking needs to be designed with security in mind - advice on this issue is contained in Safer Places. See also the Safer Parking Scheme initiative of ACPO" (page 108 Welsh Assembly Government and Dept of Transport - Manual for Streets).

As the South Wales Police officer overseeing the ACPO scheme in South Wales. I would welcome an opportunity to be involved in developing the parking framework.

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## **Torfaen CBC      Highways and Transportation Division**

#### Comments on our fundamental principles (Chapter 2)

The fundamental principles set out in Chapter 2 are supported and should provide the basis for robust policy formation. There is concern regarding one of the fundamental principles of reducing the need to travel by integrating land use planning and transport planning in respect of the timing of RTP / LDP's. In most cases candidate sites will have been considered well in advance of RTP and the chance for significant influence will be lost.

#### Comments on our vision (Chapter 2)

The vision is supported, though recognised as challenging unless adequate funding is forthcoming.

#### Comments on our priorities (Chapter 2)

The priorities will require the formulation of robust policies and a range of tools including carrots & sticks of legislation, substantial funding etc. The Draft RTP will need to reflect the evolving regional Spatial Plan and the roles of the 14 key/hub settlements.

#### Comments on our analysis of the current situation (Chapter 3)

The analysis of the existing situation demonstrates an unhealthy and increasing reliance on the private motorcar. A trend which will be extremely difficult to slow and ultimately reverse if the vision and priorities are to be realised. It is recognised that Central Government policy will be the primary catalyst for motorcar usage reduction.

The section also demonstrates the lack of comprehensive and region-wide primary data available and the need for a comprehensive and appropriately funded monitoring framework to be established. The lack of strategic modelling capability also restricts option and policy testing. Again it is recognised that this would require significant funding to develop and subsequently maintain.

#### Comments on our consultation proposals (Chapter 4)

The consultation process is very comprehensive given the challenging time frames and lack of definitive guidance.

#### Comments on our analysis of the problems (Chapter 5)

5.4 – It is refreshing to note the approach taken by Gwent Clinical Futures where accessibility has been the driving force behind their strategy of future health care provision. The proposed location of LGH'S and SCCC are based on accessibility criteria. On this basis spatial planning for health services appears to be responding to WSP.

5.6 – Land use planning and control of out of town retail developments is crucial to controlling growth of car use for ever longer trips. More facilities in local centres (through regeneration) will improve accessibility for all, not just those with cars.

5.10 – Relies on WSP aspirations for key settlements acting as hubs for public transport with turn-up and go facilities linked to the two cities. This aspiration is supported. There is an opportunity to link at least 5 key settlements (Abergavenny, Pontypool, Cwmbran, Newport and Cardiff) across 4 counties by frequency enhancements to the existing Marches rail service. This is a unique linkage opportunity without the need to change trains.

The RTP will be required to deliver robust policies to underpin these aspirations and achieve appropriate funding support.

5.12 – Can be achieved in part by aspirations in 5.10. Developments such as J33 cannot fulfil this aspiration. For example, there is no public transport option to J33 for residents of Torfaen. However, the train journey from Cwmbran to Cardiff Central Station takes approximately 30 minutes. Major development must be concentrated at transport interchanges if the plan is to succeed. A package of enhancements for a development at J33 whilst potentially beneficial will only disguise what appears to be poor land use planning.

5.15 – Can be achieved more efficiently by amendments to specifications within DTp – Manual for Highway Works, or in Local Authority Residential and Industrial Highway Design Guides.

#### Comments on our additional outcomes F5 and N8 (Chapter 5)

5.13 (F5) – Identification, regeneration and development of key settlements acting as hubs for public transport (WSP) will aid this outcome and is supported. Policies to promote this approach must now be developed.

5.22 (N8) – Probably the biggest challenge of all. Soaring parking charges and lack of car parking appear to be uppermost in the public minds. Public reaction to the fuel escalator is atypical.

#### Comments on our summary of problems (Paras 5.23 to 5.28)

5.23 to 5.28 – No comment.

#### Comments on the cornerstone of our strategy (Para 6.1)

6.1 – The cornerstones of the strategy are supported and will need appropriate funding.

#### Comments on our objectives (Chapter 6)

6.3 – The objectives are supported and will require robust policy development, legislation, funding, public support etc. if they are to be delivered.

#### Comments on our approach to considering alternatives (Chapter 8)

The concept of the preferred plan is strongly supported. The WSP – Networked City Region is essential in achieving the critical mass necessary for sustaining a competitive and vibrant City Region.

It is noted that “The Long Run” (8.4) indicates the rail strategy running to 2020, whereas the current strategy actually runs to 2018.

#### Comments on the list of actions we feel are needed (Chapter 9)

The comprehensive list is strongly supported and will require public support, appropriate funding, legislation and robust policies to achieve.

#### Comments on our monitoring proposals (Chapter 10)

It is imperative that a robust monitoring scheme is in place to measure changes in travel demand, mode choice, accessibility and public attitude. Such monitoring will require significant resource commitment.

#### Comments on the general direction of our strategy

The Outline Regional Transport Plan is broadly welcomed and supported.

The ‘Preferred Plan’ represents a significant improvement on the existing situation and goes some way toward matching the facilities our European neighbours already enjoy.

However, assuming they continue to invest in transportation at current rates, one can only wonder how much further ahead of us they will be by then.

#### Other comments

Comments from individual consultees returned directly to us are attached for consideration.

Operational Services Overview & Scrutiny Committee received a presentation on the Plan from Justin Cooper which drew many questions and comments, as well as broad support.

The minutes of the meeting are attached and reflect the issues that were raised by members.

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## **Torfaen CBC      Ken Clark, Councillor**

The Broad Aims of the strategy one cannot disagree with in the main. It is in the detail it tends to fall down i.e.

1. Disabled Act – provided bus platforms for easy access/egress to buses, but no plan for dropped kerbs so that disabled could access bus stops with wheelchair.
2. Buses do not stop at sheltered accommodation units/complexes in our ward. The people living in such places need ‘on the doorstep’ bus service.
3. Speeds on our side roads in particular have never been updated – some roads around housing estates need a maximum of 20mps – yet other roads – eg Cwmbran Drive could easily accommodate 40mps safety. Need to update all speed restrictions.
4. Poor road infrastructure in the Eastern Valley, Poontypool – Blaenavon – Brynmawr is restricting lowest development and regeneration.

5. Our housing estates and other routes are clogged at evening and weekend – a stronger view on off road parking is required. Also many firms allow employees to take vehicles home – some are big lorries and buses and these are allowed to be parked on already congested roads – why do we allow this?

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## **West of England Partnership**

## **James White (Transport Policy Team Leader)**

Broadly we support your vision, objectives and strategy and welcome your commitment to placing climate change at the top of the agenda.

Sections 5.9, 6.3 in the Sewta Regional Transport Plan highlight the importance of links and connections to England. Along with section 11.10 we believe these would benefit from references to West of England Partnership and our Joint Local Transport Plan.

Table 8.4 mentions the role of road user charging and Cardiff's investigations. The West of England Partnership is also actively involved in road user charging research with a successful £1.5m bid from the Transport Innovation Fund. As there are potentially cross border issues, with competing centres of Bristol, Cribbs Causeway regional shopping centre and Cardiff a reference to the West of England's work would be helpful here.

Finally as the First Great Western rail franchise covers both our areas we would like to see a commitment to Sewta and the West of England Partnership working together to improve services.

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