

SOUTH WEST WALES CORPORATE JOINT COMMITTEE

Report of the Chief Executive

30 March 2023

Report Title: Regional Transport Plan Guidance

Purpose of Report	To agree the Committee's response to Regional Transport Plan Guidance
Recommendation	Members to note the duties and requirements from a transport perspective. Also, to endorse the approach being taken to respond to the requirements and duties, and approve the response to the draft RTP guidance. That WG be pressed for additional funding to facilitate the development of the RTP.
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Background:

1. Welsh Government issued the latest version of the draft Regional Transport Guidance on 17 January 2023, following an all Consortia officers meeting to discuss Corporate Joint Committee Planning Duties. Transport Officers have reviewed this latest draft guidance, in order to advise the CJC. There are a range of matters that require the CJC to respond to.
2. An update on the progress to deliver a Regional Transport Plan for the five-year period 2025 to 2030 was provided to the South West Wales Corporate Joint Committee Overview and Scrutiny Committee 23rd February 2023, at which there was useful examination of the key issues.

Overview of Draft Regional Transport Plan guidance:

3. The plan together with the assessments is to be submitted to WG by August 2024 with its content summarised as follows:
 - Introduction, covering: Overview, Purpose, Background and Legal Duty & Statutory Duties
 - Delivering the Wales Transport Strategy, covering: Relationship with the National Transport Delivery Plan (NTDP), Plan Period and Coverage, Transport policies and plans, Relationship with Land-use Policies and Plans, Current and Future Trends, Statutory Checks, Monitoring and Evaluation, Format of the Plan, Strategic Assessment
 - Approval Process, covering: Welsh Ministers Role, Assessment of Transport Plans & Timetable
 - Annex 1 – Format of Regional Transport Plan

- Annex 2 – Data

Key issues emerging from initial overview of the draft guidance:

4. As noted, the South West Wales Corporate Joint Committee Overview and Scrutiny Committee 23rd February 2023 considered initial feedback on the draft guidance.
5. WG have issued a matrix to support the exchange of comments in relation to the Guidance. The matrix is segmented into five key themes and includes items raised by the WLGA and responses from WG. The five key themes are 1. Resources 2. Timescale for delivery 3. Governance 4. RTP Management and Delivery 5. RTP Guidance specific matters raised. A review against these 5 key themes has now been considered in greater depth, in Appendix 1.
6. In summary, therefore, the key elements of feedback are:
 - a) Existing local authority resources are stretched; the demands created by the Guidance are onerous – the case of additional funding needs to be continued to be pressed.
 - b) A dedicated programme manager post is required.
 - c) Timescales are extremely ambitious under these circumstances.
 - d) The RTP should interface with other plans, such as the proposed SDP, which is yet to commence. Consultation on RTP at this time will likely only establish aspirations rather than definitive proposals.
 - e) Concern over the “top down” approach.
 - f) The duty for producing the RTP rests with the CJC – it essential the CJC take the lead, and not a Burn’s Commission type arrangement.
 - g) Allowance needs to be made in the programme for the various stages of review and approval.
 - h) Additional resources are made available to support delivery, then there is a risk it may not be possible to deliver the Programme in full.
 - i) Continuing funding for RTP delivery on the current basis will not guarantee each authority is able to access the funds for RTP delivery of the scale needed and at the time they are required.
 - j) It would be helpful to make opportunities available to the CJC and its RTP ‘team’ to engage with WG assessors prior to submission of the RTP.
 - k) Producing the RTP is a substantial task that at this moment in time has some significant unknowns, which in turn creates risks that even if additional resources are made available to CJC’s, it may not be possible to complete the RTP in the timescale proposed.
 - l) The requirement to undertake statutory checks to inform the RTP adds to the complexity and risks, again potentially impacting timescales.
 - m) There is an early requirement for data analysis which is likely to require substantial input from the modelling team within Tfw. There is a risk that outputs from this may be delayed if all CJC’s approach Tfw with their requirements at the same time.

- n) It is incumbent on WG and TfW to take a lead in raising awareness of the need for change and leading the political debate in this area. By doing so it will demonstrate that this is a national imperative not just a regional choice.
- o) Given the diverse nature of the region, it would be helpful if the RTP guidance could outline where a community based approach may be most helpful and where a modal approach might be more relevant.
- p) There is regional concern that economic development and ambition will be limited or restricted if the necessary enabling transport projects are not considered a priority in sustainable transport terms.
- q) Further guidance would also be useful in terms of how to address the potential conflict between encouraging and facilitating more home working or working closer to home and the requirement to support economic growth and inclusion through encouraging people to travel.

7. It is therefore recommended that a formal response is sent back to Welsh Government, highlighting the CJC concern over the key points, particularly around funding, resources and programme risk, and the wider more detailed feedback also be forwarded on for wider context and response.

Resources to develop the Regional Transport Plan

8. In considering the resources needed to develop the Regional Transport Plan, transport officers had considered the minimum level resource requirement to deliver basic requirements, as follows:
 - Regional Transport Plan Development and Programme – Lead Officer
 - Graduate Trainee / Support Officer
 - The commissioning of Specialist Studies and Commissions
9. Given the budgetary pressures described earlier, and that the guidance is still in draft format, at this stage it is considered that only the Regional Transport Plan Development and Programme Lead Officer role be developed further, and officers are drafting a job description for evaluation and approval.

Financial Impacts:

10. It is noted that the CJC has approved a budget for the Transport work stream and officers are progressing the preparatory work for the appointment of a programme management officer. Further it recognised that there is some resource to support the specialist studies in the event that the WG does not provide additional funding. However there is an urgent requirement to press WG for additional funding before the CJC are in a position to earmark specific sums and clarity is required on exactly what Transport for Wales are going to provide in terms of resources to facilitate the process.

Integrated Impact Assessment:

11. The Corporate Joint Committee is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the Acts
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those who do not
 - Deliver better outcomes for those people who experience socio-economic disadvantage
 - Consider opportunities for people to use the Welsh language
 - Treat the Welsh language no less favorably than English
 - Ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs

Integrated Impact Assessment:

12. At this stage, no integrated impact assessment is required. The purpose of this report is to endorse the approach being taken to respond to the requirements and duties, and approve the response to the draft RTP guidance. As further strategies and policies are developed they will be accompanied by full integrated impact assessments to enable the CJC to ensure compliance with legislative obligations.

Workforce Impacts:

13. Workforce impacts are covered in the body of the report.

Legal Impacts:

14. The Corporate Joint Committees (Transport Functions) (Wales) Regulations 2021 (“the 2021 Regulations”) require the CJC to develop transport policies and establish a regional transport plan for its area.

Risk Management Impacts:

15. There are a number of risks associated with the delivery of the Regional Transport Plan, which are covered in the body of the report.

Consultation:

16. There is no requirement for external consultation on this report.

Reasons for Proposed Decision:

17. To ensure the Corporate Joint Committee can actively involve others in their work programme.

Implementation of Decision:

18. This decision is for immediate implementation.

Appendices:

19. Appendix 1: Detailed Transport officers Comments on the RTP Guidance.

List of Background Papers:

20. Welsh Government Draft Regional Transport Plan guidance.

Appendix 1: Detailed Transport officers Comments on the RTP Guidance

- Resources - general

While there is a good working relationship in the South West Wales Region, there is presently no dedicated resource for supporting regional transport work. Since the disbanding of the formally constituted transport consortium, SWITCH, Local Authorities have continued to work together and the region has long standing relationships and have a track record of collaborative working, knowledge of the region, political awareness and, importantly, delivery. However, the additional workload imposed by the development of the RTP cannot be delivered on this basis and there is a requirement for a project manager and assistant to coordinate the programme, undertake engagement, prepare and manage commissions to allow the RTP to be delivered.

Existing Resources within each of the LA's are already stretched, and as a result many of the studies required to complete the RTP will need to be outsourced to consultants.

Local Authority Officers have finite capacity and this will impact on the time available to engage with the process, whether this be to free up time to undertake work required to support RTP production or simply to engage in the process of informing or reviewing the RTP and associated documents as they are developed. In these circumstances, it is critical that any additional resources provided to CJC are adequate to fully accommodate the requirements for RTP production. It cannot be assumed that local authority staff will simply be able to supplement that resource.

It will take time to address the resource issues and appoint the right people into the role of project manager and assistant. This is a real concern, as the programme for delivery is very front-loaded. The project manager will need to be in post to ensure that the implementation plan is set out how they envisage the programme running going forward.

In developing the RTP the Project manager will have an in-depth knowledge of the RTP, a good understanding of the needs of our local communities and will have established numerous contacts. It is important that these skill and knowledge be retained for the delivery phase of the RTP.

The guidance does not indicate how TfW or WG will be able to provide assistance, the scale of the assistance on offer or how this will be funded and managed.

- Resources - Funding

As with previous iterations of the Transport Plans, funding is required from Welsh Government to produce the revised RTP.

- Timescale & Programme

It is useful to have a programme setting out the expected timescales for delivery of the RTP. The programme proposed in the draft guidance is extremely ambitious with just 8 months to produce a CJC implementation plan, draft RTP, Interim ISA report and WelTAG document. Considering the amount of background work that needs to be undertaken to produce these documents it is felt that this is an unrealistic programme.

The programme is very 'front end loaded' with the timescales being very tight at the start, it will be necessary to appoint the programme manager before work can commence. We are particularly conscious that finding people with the necessary experience and skills, willing to take up the role/s, will not be straightforward. Authorities in the region already experience significant difficulties filling the vacancies they have at all levels. With any posts required likely to be offered on only a temporary basis this will add to the difficulty and thus simply filling the position/s may take a significant time in its own right, potentially delaying the time when work on the RTP can commence. We do not believe this is a role that can readily be contracted from a consultant. It requires someone with local knowledge not only of the region but ideally the ongoing work of the authorities within this, including on metro and in non-transport sectors (planning, development, health, etc.) which the RTP needs to facilitate access to. Having knowledge of the key stakeholder organisations and existing contacts within these will also be crucial the time it takes to commence and progress work on the RTP.

The CJC has yet to commence work on a Strategic Development Plan (SDP) for the region and authorities existing Local Development Plans (LDP) are coming to the end of their current lifespan and require review and updating. The RTP Guidance makes clear that synergy between these plans and the policies and actions proposed by the RTP is required. Future plans can be expected to seek to reverse recent trends for edge of town development, centralisation of services, etc. and work towards the formation of 15/20 minute zones, etc. that will enable transport planners to develop more sustainable solutions. However, without plans in place to make clear how and where this will be achieved, over time, it will prove particularly challenging for those working on the RTP to identify the policies and actions they can put in place to support it. Doing so through consultation with non transport bodies at this time will likely only establish aspirations rather than definitive proposals and will take significantly longer than being able to simply review the SDP and LDP's themselves.

The CJC has the accountability and decision making powers to develop and approve the RTP; no allocation has been made in the programme for scrutiny and approval of the various documents by the CJC and LA's.

- Governance

The top down approach of the guidance with CJC's and Councils expected to deliver the priorities in the NTDP and WTS does not allow the freedom to influence the RTP with the priorities and needs of the region. While it is recognised that there needs to be an alignment of policy there also needs to be recognition of local knowledge and the needs of the communities that rely on the transport network.

While CJC's and Councils are happy to work with WG and Tfw on the production of the RTP the duty sits with the CJC's. We would suggest that a Burn's Commission type arrangement where an independent chairperson takes a lead is not appropriate for the production and delivery of the RTP. The CJC is responsible for the delivery of the RTP then it is essential the CJC take the lead.

An allowance needs to be made in the programme for the various stages of review and approval that need to take place by both the CJC and the individual LA's

- RTP Management and Delivery

As outlined above transport officers within the LA's already find themselves fully occupied with their day-to-day duties. RTP guidance highlights that an ambitious RTP policy programme and action plan will be required in order to meet WG's ambitions for a major shift in the way people travel that can address both economic growth and climate change. Responsibility for delivery of this programme through to 2030 and beyond will rest with Local Authorities.

There is concern that existing staff will simply not have the capacity to achieve delivery of such an ambitious programme, alongside their other responsibilities, bearing in mind the change management, demand management, behavioural change and requirements for a holistic and more integrated approach that will be necessary to bring it about. It is recognised the RTP programme will replace some of the work staff are already undertaking. However, overall it is envisaged that workload will increase as a result of the RTP and unless additional resources are made available to support delivery, then there is a risk it may not be possible to deliver the programme in full.

Delivery of an ambitious programme will also require substantial funding support. It would be helpful to have an indication of the funds that may be made available to authorities for delivery, in order to be able to plan the programme within the funding envelope. To date WG's response has been to suggest authorities will be able to draw on sources they currently use such as the Local Transport, Active Travel and ULEV funding programmes, etc. However, the level of funds currently available from these programmes is unlikely to be adequate, proposals may not always fit within current criteria and current programmes are competitive. Continuing funding for RTP delivery on this basis will not guarantee each authority is able to access the funds for RTP delivery of the scale needed and at the time they are required.

The RTP Guidance outlines an assessment process for the RTP and its supporting documents that will take place following submission to WG, with up to two check-ins with WG taking place while the RTP is in production. There is concern to ensure that on submission the RTP presents no surprises and fully meets the requirements of WG in order its approval is not delayed and subsequent delays to delivery (or funding) do not occur. In this context, we believe it would be helpful to make opportunities available to the CJC and its RTP 'team' to engage with WG assessors prior to submission of the RTP. This will enable them to discuss their intentions for the RTP with them in advance and

for assessors to be able to provide a clear and detailed steer on suitability, acceptability and the approach to delivery they expect to see.

- RTP Guidance specific matters raised

Producing the RTP and associated documents is a complex and somewhat unwieldy process requiring consideration of a wide range of policy areas not just in relation to transport but also in all other areas where transport is required to facilitate access (to address interdependencies). There is also substantial data gathering necessary to baseline the current position and data analysis required to identify gaps and predict future trends and requirements. Substantial consultation is required across a wide range of stakeholders and significant liaison with partners will be necessary to tackle the inherent political sensitivities and bring about the holistic and integrated approach to sustainable transport development sought. Successful funding bids each with their own supporting business case will also be needed to fund delivery of the RTP programme. Collectively this adds up to a substantial task that at this moment in time has some significant unknowns, which in turn creates risks that even if additional resources are made available to CJC's, it may not be possible to complete the RTP in the timescale proposed.

The requirements for iteration between the production of the ISA, RTP and WelTAG Lite whilst recognised as necessary in itself may add to the time it takes to be able to produce the final RTP and ensure duplication between this and the ISA/WelTAG Lite is avoided. There will also be issues ensuring clarity of focus between the three documents.

The requirement to undertake statutory checks to inform the RTP, including options appraisal, environmental studies, habitat studies, HRA screening, Integrated Well-being Appraisal, etc., albeit at a regional level also adds to the complexity and risks, again potentially impacting timescales.

There is an early requirement for data analysis which is likely to require substantial input from the modelling team within TfW. There is a risk that outputs from this may be delayed if all CJC's approach TfW with their requirements at the same time. There may also be a general issue regarding TfW's capacity to meet the demands for its support that may come from CJC's.

It is recognised that CJC's and local authorities have a key role to play in promoting behaviour change and implementing the demand management measures required to bring about increased use of sustainable transport options. However, we believe it is also incumbent on WG and TfW to take a lead in raising awareness of the need for change and leading the political debate in this area. By doing so it will demonstrate that this is a national imperative not just a regional choice and indicate to local communities that the measures local authorities are putting forward are necessary and required by government.

The diverse nature of the SW Wales region, ranging from the highly urbanised areas of Swansea and Neath Port Talbot to the very rural parts of Carmarthenshire and Pembrokeshire will require a wide range of different transport solutions. In this context it is likely the regions RTP will need to focus on communities and the transport networks they require rather than on modes alone. It would be helpful if the RTP guidance could outline where a community based approach may be most helpful and where a modal approach might be more relevant.

There is regional concern that economic development and ambition will be limited or restricted if the necessary enabling transport projects are not considered a priority in sustainable transport terms but have the potential to bring inward investment to the region, and the economic and social benefits associated with such projects.

Further guidance would also be useful in terms of how to address the potential conflict between encouraging and facilitating more home working or working closer to home (for example, at transport hubs) and the requirement to support economic growth and inclusion through encouraging people to travel.

- Other specific comments on the guidance as follows:

	It would be useful if workshops were held to offer advice and provide guidance on the development of the RTP. Is it the intention that WG will be organising such workshops?
1.1.4	When are the emerging Strategic Development Plans due to be approved? To date no work has been undertaken on the regional SDP and there is no funding to produce the document. To develop a robust RTP future demand on the road network needs to be predicted with a good understanding of future development plans.
1.3.4	The transportation of freight in our region relies largely on the Strategic Transport Network, which is under the responsibility of the Trunk Road Agents and Network Rail. While the CJC will consult with both parties during the development of the RTP improvements to the rail network and trunk roads is outside the responsibility of the LA's, as a result LA's would be unable to deliver these improvements. Guidance on proposals to improve the transportation of freight in the delivery plan on infrastructure outside the control of the LA is required.
1.5.2	The impact on the reduction in BES payments is a huge concern. There is a real danger that the limited bus network that we have now will be further reduced. The impact of losing bus providers and drivers from the area will be difficult to recover from considering there is already a skills shortage in that sector. The impact on our local communities to be able to travel by public transport will be huge leaving many of our communities with no provision and no alternative other than to travel by private car.

1.6	<p>The ambitious policies of the WTS are admirable; however, the lack of proposed investment in the highway network, as demonstrated by the roads review is making development difficult in many of our communities. The existing highway network is restricting development for both residential and business use. This is making it difficult to bring services to people in order to reduce their need to travel and allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.</p> <p>Guidance is needed for to establish the type of scheme that is to be included in the RTP. While many of the proposals will sit within the remit of the WTS It is envisaged that some of the problems faced by our communities and address issues stymieing economic development, will need to be addressed by improvements to the highway network. It is unclear if all future highway improvement proposals will need to be assessed by a Roads Review; if this were to be the case, would they need to be assessed prior to being included in the RTP, thereby extending the programme for delivering the RTP. Guidance is needed on this matter to determine what schemes can be included, to assess the programme for delivery of the RTP and to temper expectations.</p>
1.6.4	<p>To allow LA's to deliver the ambition set out in the WTS, the proposals that LA's include in the supporting delivery plan will need to be supported financially by WG.</p> <p>An indication of the level of funding that will be available to implement the proposals is required; this will allow the level of ambition to match the available funding.</p> <p>Without this information there could be a huge gap between the level of funding and the schemes proposed for delivery – this will only serve to set LA's up to fail in delivering the ambitions in the WTS.</p>
2.2.4	<p>Is the intention that EIA screening is undertaken on the RTP as a whole or on each of the individual projects proposed for delivery?</p>
2.3.1	<p>Is the WG intending on providing training on the revised WelTAG for LA's.</p>
2.3.11	<p>Will guidance be given on Stakeholder engagement to ensure that no key stakeholders are inadvertently omitted from the consultation process? It is appreciated that the draft WelTAG document provides guidance on engagement but it is felt that more specific guidance is required.</p>
2.3.8	<p>Given that there is so much uncertainty in the bus sector with reduction in services due to the removal of BES payments and changes being proposed by TfW it is difficult for the CJC and LA's to plan for the future.</p>
2.6.2 Annex 2	<p>TfW support is welcomed. To date, any assistance or projects that the region has worked with TfW on has required a budget to be in place for their services, if resource is available within TfW to assist, on what basis will this be provided?</p>

	The logistics of the procurement of TfW by the CJC would need to be considered. Alternatively, is it the intention that WG would commission TfW on behalf of the CJC?
2.4.5	It is possible that some of the proposals will increase capacity in the highway network – is the intention that any future highway schemes are subject to the same review process.
2.5.6	As noted above the SDP may not be developed until after the RTP deadline.
2.7.6	Demand Management or behavioural change are politically sensitive, require large investment and often take a long time to deliver. It is considered that many of the proposals suggested are outside the remit of LA's and should be undertaken as a national programme. LA's are not able to change the level of service or cost of public transport; due to the hierarchy of travel it is vital that public transport is made more convenient, accessible and affordable to meet the everyday needs of our residents and visitors. To allow LA's to gauge the level of ambition an indication of the level of funding likely to be available in future years is required.
2.7.8	Was the COM-B model of behaviour change completed for the WTS if so is it necessary to complete this exercise again?
2.8.2	Details of what statutory checks have been undertaken will need to be shared with LA's.
2.8.3	Will WG ne organising workshops on undertaking Integrated Sustainability Assessment (ISA) It is likely that an Integrated Sustainability Assessment (ISA) will need to be undertaken externally by consultants. Is the intention that WG will provide funding to complete this assessment? As the exercise has been complete for the WTS and NTDP is it necessary to complete this again especially as 2.8.8 clarifies that this is not undertaken at project level for the RTP. Is the intention that the WTS ISA is shared with the CJC's?
2.8.4	Habitats Regulations Assessment (HRA) will need to be undertaken externally by consultants. Is the intention that WG will provide funding to complete this assessment? As the exercise has been complete for the WTS and NTDP is it necessary to complete this again especially as 2.8.8 clarifies that this is not undertaken at project level for the RTP.
2.9.8	The value of an engagement plan is recognised. However, to ensure that there is a consistent approach pan Wales and that where possible the views of all key stakeholders are captured guidance is required from WG to include a list of stakeholders.
2.10	The importance of undertaking Monitoring and Evaluation is recognised. Delivery of the projects within the RTP will often not be possible without financial support from WG, it is therefore important that the ambition in the RTP is set to fit the level of funding available. The success of a RTP is often dependant on factors outside the control of LA's i.e. ticket prices, public transport service frequency etc.

2.13.5	Is WG to provide funding for the secretariat and project manager positions? Appointment of appropriate personnel will be required; this will take time, which has not been allowed for in the programme.
2.13.6	It is unclear what process gateway reviews will follow. It is equally important that WG and TfW work alongside the CJC and LA's in the production of the RTP. The timetable for delivery is extremely tight an undertaking is required from WG and TfW that reports will be reviewed in a timely manner.
2.14.2	The timetable is very ambitious and may not be achievable.
2.14.6 2.14.7	The ISA and evidence base for WTS and NTDP need to be made available to CJC's.
2.14.15	It is unclear what the Final Scoping Report is, is it the Implementation Plan?
2.14.17	Should the consultation report form part of the RTP, the WelTAG report or is it a standalone report with results summarised in the RTP and WelTAG reports.
3.3.1	The timetable for delivery of the Implementation Plan, RTP, WelTAG lite Report and Integrated Sustainability is extremely tight.
Annex 2	The offer of assistance by TfW in providing a range of data. It is unclear if there will be a cost incurred by the CJC for the data. It is noted that permissions are required to allow some of the data to be shared with CJC's, is it possible for WG to arrange for these agreements to be in place for the 4 CJC prior to the start of the process to avoid unnecessary delays. It is also unclear if TfW have capacity to undertake the required traffic model for all 4 of the CJC in the very tight timeframe.
Annex 3	The programme in Annex 3 does not match the programme on page 28.
	Given the limited resources available in each of the LA's and the fact that many of the studies required in developing the RTP will need to be completed by consultants there needs to be time in the programme for the preparation of tender documents, tender process, completing the study work and the scrutiny of reports by the LA officers. There is also a real risk that Consultants will not have capacity to assist in the delivery of the RTP. It is likely that the 4 CJC will be approaching the same small pool of consultants in Wales asking that they undertake this work at the same time as delivering their other commitments.
	While equalities is referenced throughout the report there is no requirement for an Equalities Impact Assessment, it is assumed that this is required.
	The programme shows that the CJC needs to submit the request to TfW for any analysis works at the start of the process. While it is appreciated that options appraisal and testing will take time, much of this work cannot be done until the proposals for improvement are identified. Analysis work may need to be split into two sections to

	allow baseline data to be assessed initially then the impact of proposals to be assessed once identified.
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