

Response of Growth Track 360 and the Mersey Dee Alliance to the North Wales Transport Commission Interim Report, June 2023

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Executive Summary

This response is made on behalf of Growth track 360 and the Mersey Dee Alliance. It focusses on the need to achieve modal shift from the car to public transport in North Wales, and Wrexham and Flintshire in particular, on a cross border basis.

There is substantial cross border commuting for work (30,00 people per day) within the MDA area and 200,000 cross border movements per day (Llwybr Newydd, based on mobile data) between North Wales and the North West of England. Broadly speaking, road and rail connectivity between North Wales, the wider UK and international gateways, is achieved via Chester. Many core bus routes for North Wales terminate in Chester as well.

GT360 and the MDA believe that the current level of cross-border collaboration led by Transport for Wales is underplayed in the interim report. The final report should give a higher profile to the need for cross border collaboration and celebrate that which is currently being achieved.

GT360 and the MDA: -

- Strongly supports all the recommendations and the direction of travel adopted by the Commission in its interim report.
- Are concerned by the number of recommendations in the interim report, which will require considerable resources to take forward as whole. We suggest that the Commission considers 5-7 priority programmes covering rail, bus, active travel, integration, rural and tourism and some of the enablers (e.g., planning and town centre regeneration).
- GT360 is concerned by the scale of the task facing in transforming transport from a car-based system to a more balanced system in which non-car modes enable 45% of trips. Non-car modes will need to double their market share to meet the 45% target. This concern is driven by the current lack of resources (capital and revenue) to make improvements to public transport and even active travel. Indeed, current problems in public transport may be reducing the current share of non-car modes.

The Roads Review created a negative context around the Commission's work. It also led to the addition of a review of the resilience of the Menai crossings. GT360 and the MDA:-

- Seek equal treatment of the A494 Dee Bridge Crossing to the Menai Strait. The Dee Bridge (A494) is in poor structural condition and carries 61,000 vehicles per day, far more than the Menai crossings reported total of 42,000. Should the Dee Bridge close the reputational and economic damage caused to Wales will be seismic. The Welsh Government will be foolish not to prioritise its repair and include bus priority and active travel into its renewal.
- Supports Flintshire County Council's contention that there is a case for investing in A55 resilience with a crawler lane between the Northop and Holywell Junctions along with trunking the A548 and the Connahs Quay Bridge.

The delivery scepticism reported by the Commission has a strong foundation in fact: -

- Rail Enhancements in North Wales will be dependent on the UK Government allocation of capital as rail infrastructure is non-devolved. This is problematic as the current rail enhancement budget is over-committed due to overspends and an over ambitious pipeline of projects relative to the funds available.
- The UKG has cut revenue funding for public transport leading to cuts in bus and rail services. In addition, usage has declined and changed following Covid, reducing revenue for bus and rail operators. This crisis in public transport is unlikely to be alleviated in Wales until the UK Government invests in public transport in England, generating Barnett Consequentials for transport in Wales.

GT360 recommends that the Commission, as part of its report, writes directly to the Secretaries of State for Transport and Wales to underline the high dependency of transforming and decarbonising transport in North Wales and the cross-border area on: -

- Capital investment in rail infrastructure in North Wales, Chester, Wrexham to Liverpool, Crewe and Warrington
- Better funding for public transport in England to generate Barnett Consequentials to make Welsh transport decarbonisation plans affordable and deliverable.
- Better funding and enhanced transport powers for neighbouring local authorities in England (Cheshire West and Chester Council, the Cheshire and Warrington LEP and the Liverpool City Region Combined Authority) to enable them to respond to and connect with improved, decarbonised transport in Wales. This will improve the connectivity of North Wales with inter-connected economic areas and drive economic growth through agglomeration.

GT360 and the MDA support recommendation 37 (Revision of TAN-18, Transport and Land Use Planning) and consider that it should be enhanced to include recommendations: -

- To use compulsory purchase powers for land assembly to develop high quality active travel networks.
- To review business rates in Wales to better share the burden of business taxation between town centres and out of town developments. This will be essential to support WG policy preferences for town centre regeneration and enabling more public transport and active travel to access to services in town centres.

Finally, GT360 and the MDA believe that is unlikely that capital funds to commence the construction of rail, bus priority and active travel networks and new revenue monies to support new transport services will be available until after the next general election and the new CSR for 2025/26 onwards. GT360 recommends that the Commission seeks assurances from the Welsh Government and UK Governments that they will provide substantial development funding for the North Wales Metro Programme (WG) and the North Wales and cross border rail infrastructure priorities in the next 18-months to 2 years. This will enable Transport for Wales and Network Rail to prepare detailed business cases for the whole range of the Commission's priorities for rapid implementation once new capital and revenue funds become available.

Who we are and our Perspective.

Growth Track 360 (GT360) is a public-private partnership of Local Authority, Business and Transport Sector Leaders campaigning for better transport connectivity and public transport in North Wales, Cheshire and South Merseyside. The Board of GT360 comprises of representatives of the Cheshire and Warrington LEP, Ambition North Wales, the Mersey Dee Alliance, the Liverpool City Region Combined Authority, the North Wales Mersey Dee Business Council, the West Cheshire and North Wales Chamber of Commerce and Transport for Wales. The Board is advised by, and works with, Network Rail, Transport for the North, Cheshire East Council, Transport for Wales and officials of both the Welsh and UK Governments.

Growth Track 360 was formed in 2016 with the support of Welsh and UKG transport ministers to pursue electrification of the North Wales Coast Main (railway) Line (NWCML) from Holyhead to Crewe. Over time GT360 has developed an agenda that seeks incremental improvements in rail services and infrastructure that will drive passenger growth and enable rail to better service the regional economies of the partners.

This history reflects the founding principle that the improvement of the North Wales Railway Network is best achieved by working in partnership with the partners who comprise “the whole system” of which the North Wales Rail network is a part. Chester, Crewe and Warrington are key destinations and hubs that connect North Wales to the wider UK rail network and the economically vital destinations of Liverpool, Manchester, Manchester International Airport, Cardiff, London, Birmingham Airport and Birmingham.

GT360 is now funded by the members of the Mersey Dee Alliance (MDA), following initial investments from the Welsh Government, Ambition North Wales and the host authority, Cheshire West and Chester Council. The political leadership of GT360 is drawn from the local authorities who make up the MDA, Cheshire West and Chester Council, Wirral Council, Flintshire County Council and Wrexham County Borough Council. In recent years GT360 has taken on a transport advisory role for the Mersey dee Alliance and enabled the partners to discuss improving cross border bus and active travel provision.

GT360 brings the perspective of a cross border alliance seeking, like the Commission, to achieve modal shift from the car to public transport. GT360 draws on the experience of partners from both Wales and England.

The advice of GT360 will focus on the need to support and decarbonise substantial cross-border movements of people and goods for economic, social and cultural purposes.

This GT360 submission will therefore also represent the response of the Mersey Dee Alliance.

GT360 Welcomes the Interim Report and its Draft Recommendations.

Growth Track 360: -

- Welcomed the establishment of the North Wales Transport Commission in 2022.
- Strongly supported the terms of reference from the Welsh Government which mandated the NWTC to make recommendations to develop multi modal, public and active transport alternatives to car travel, so that carbon emissions, congestion and pollution from transport in Wales can be reduced and eliminated over time.

The Commission is praised for its commitments to make recommendations based on: -

- Stakeholder Engagement
- Evidence on transport usage data in North Wales
- Prioritisation interventions for investment and implementation

The interim report is well structured and presented, enabling stakeholders to respond effectively and constructively to the Commission's recommendations.

Growth Track strongly supports the direction of travel advocated by the Commission and looks forward to its final report.

North Wales Transport Commission (NWTC) Mission

Growth Track 360 supports the mission adopted by the NWTC. Action to mitigate and counteract climate change is essential and urgent. With 17% of Welsh Carbon Emissions coming from the Transport Sector it is necessary to begin a radical and meaningful process of transport decarbonisation in North Wales and the neighbouring cross border areas.

Figures show that in recent years there has been little reduction in transport emissions, whereas progress has been made in reducing emissions from electricity production and industry. GT360 believes that there is a need for governments and public authorities to implement more radical policies and investments to drive change in transport modes and behaviours.

Modal Shift from the private car to public transport has the means to reduce carbon emissions, congestion and pollution. Boosting public transport usage will improve health outcomes as well as reducing carbon emissions and congestion as it invariably requires some walking to, and within, the rail and bus networks.

GT360 notes that the Welsh Government does not assume the whole transfer of the current usage of petrol and diesel cars to Electric Vehicles. Electric Vehicles are more expensive to purchase than existing cars. The electricity grid and charging infrastructure is likely to be a constraint on the number of EVs that society can sustain. In this context the Welsh Government, along with most transport think tanks and professionals, wishes to see: -

- Public transport and active travel play a much bigger role in how people travel.
- The land use planning system promote a less car-based economy, where town centres can play a bigger role in providing retail, living and employment opportunities in place of large out of town locations.

This policy interventions will drive the process of decarbonising of transport by reducing the number of car journeys and improve health by relieving congestion and enabling more active travel.

The Welsh Government laid out its commitment to decarbonise transport and reduce car use in Llwybr Newydd which set a long-term target of 45% of journeys being by "sustainable modes" (active travel and public transport). It is possible that the public may resist this transition from private car-based transport to public transport and active travel without significant transformation and improvement of public transport and active travel options, which give support and incentives for change.

Modal shift on the scale set out in Llwybr Newydd will be challenging given the current modal shares identified by the Commission in North Wales: -

- Car 80%
- Walking 10%
- Public Transport 7%
- Cycling 4%

The non-car-modes of travel need to more than double to meet the aspirations in Llwybr Newydd.

The Commission recognises that the region is starting from a low base with relatively poor public transport and active travel offerings. GT360 is concerned that too many people can only travel to work by car and that labour mobility in North Wales and the wider MDA area is hindered by the lack of good public transport.

Good transport infrastructure and connectivity supports and begets economic growth. From the 1970s and 1980s the region's transport has been highly reliant on its road network, which is becoming increasingly congested and vulnerable to disruption. It is time to develop alternatives to road transport for the long-term economic sustainability of North Wales and the cross-border area in England.

The road and public transport networks of North Wales are connected those of the MDA partner authorities in England, Cheshire West and Chester and the Wirral, with significant cross border movements. Work for Llwybr Newydd identified 200k cross border movements per day from North Wales to the North West of England (based on mobile phone data). Work on decarbonising transport in North Wales must involve neighbouring authorities to improve public transport and active travel offers.

GT360 supports the Commissions aspirations that: -

- Welsh Government, Transport for Wales and Local Authority partners work together to lead improvement in bus services, active travel and inter-modal integration.
- The UK Government, Welsh Government, Transport for Wales and Network Rail work together to lead the improvement of rail services and infrastructure to enable frequent and reliable services that will integrate well with bus and active travel and underpin a "North Wales Metro" public transport offer.

Growth Track 360 commits to supporting and contributing to the joint working proposed by the Commission (between Transport for Wales and Local Authorities), particularly, with regard to the delivery of improved rail services and infrastructure on a cross border basis.

GT360 also offers the proposed North Wales Delivery Unit, which will work on implementing the Commission's final recommendations as agreed by the Welsh Government, a vehicle to engage with cross border partners.

The "Roads Review" and Its Impact on the Economy

GT360 notes the Commission's reporting of some stakeholder's disappointment at the outcome of the Welsh Government Commissioned Roads Review. This has put the Commission's work in a negative context and positioned its recommendations as potential mitigation of the outcome of the Roads Review.

Flintshire and Wrexham expressed disappointment at the loss of the proposed: -

- Red Route to alleviate congestion on Aston Hill and improve access and egress for commuting (for work), visiting (for tourism in North Wales) and commercial movement of heavy goods to and from Deeside Industrial Estate.
- Wrexham A483 Roundabout upgrades for the A541 and A525 to alleviate congestion and enable employment, housing and multi-modal transport investment for Wrexham's two "gateway schemes" which include: -
 - the town centre gateway via Wrexham General Station and
 - The Western Access to Wrexham via the A525, which would have allowed for the extension of the Wrexham Technology Park, a flagship Moneypenny expansion and new housing.
- Crawler lane on the A55 between the Northop (A5119) and Holywell (A5026) Junctions which would have reduced congestion for visitors and workers caused by slow moving vehicles (like farm tractors and lorries bound for the Holyhead Port)
- Renewal of the A494 Dee Bridge
- Designation of the A548 to Prestatyn (including the A548 Deeside Bridge) as a trunk road.

These road enhancements would have resolved pinch points on the road network that are of considerable consequence to the cross-border economy. It will be very challenging for the partners to develop effective and efficient public transport and active travel alternatives for car traffic using these routes, particularly on the Aston Hill, where significant usage arises from tourism.

There is concern within GT360 and the MDA that the roads review outcomes will depress economic growth in North East Wales, reducing the competitiveness of the local economy as an investment location.

GT360 therefore advises that ambitious and well-resourced public transport and active travel interventions will be required in North East Wales to offset the negative impact of the roads review on future economic growth.

The Dee Bridge (A494)

The current A494 River Dee crossing was constructed in 1960. It is accepted and well reported that the bridge requires substantial repair.

The crossing is critical to both North Wales and the cross-border economy, being the main access route to Deeside Industrial Park from North Wales and the Western Bank of the River Dee. It carries a substantial part of the tourist traffic from the North West of England as it links the A494 to the M56 to Manchester and the M53 to Liverpool.

The bridge is critical transport infrastructure which carries around 61,000 vehicles per day, far more than it was designed for.

GT360 notes that the NWTC was commissioned to review the Menai crossing in the context of the recent closure of Telford's Menai Bridge, following traffic chaos and adverse local reaction to the closure. The Menai crossings together carry around 46,000 vehicles per day, the bulk of which use the Britannia Bridge. This compares to the Dee Bridge traffic of 61,000 vehicles per day.

Should the Deeside Bridge have to close or collapse into the River Dee the reputational damage to the Welsh Government would be far greater than that suffered following the Telford Bridge closure. It would place great pressure on the old Queensferry bridge, Shotton and Connah's Quay (to access the A548 bridge) and the A55 Dee crossing on the Chester Southerly Bypass leading to congestion in the Eastern and Northern suburbs of Chester.

A structurally sound Deeside Bridge is essential to the creation of cycle and walk ways and enabling more public transport services to travel across the bridge and service the Deeside Industrial Park (as recommended by the Commission). In that sense, the need to repair the bridge is an opportunity to build high impact active travel and public transport routes (e.g., one or more bus priority lanes and cycle/walking lanes) into an upgraded bridge.

GT360 recommends that the Transport Commission adopts the repair or replacement of the Deeside Bridge as a key recommendation: -

- To maintain a resilient high-quality road network as per Llwybr Newydd
- To enable a high impact active travel corridor and bus priority measures to be built into an upgraded/replacement bridge.
- To underpin Commission recommendations to improve public and active transport access to Deeside Industrial Park (DIP) for Welsh residents living on the Western Bank of the Dee.
- To protect against future reputational damage to the Welsh Government from any closure for safety reasons
- To protect against economic damage to Deeside, Chester and Welsh Tourism from any closure.

Growth Track 360 asks that the Dee Bridge is treated equally to the Menai Crossings and that the Commission seeks authority from the Minister to make recommendations on how the Dee Bridge crossing can be made more resilient in the context of its poor structural condition.

A55 and A548 Resilience

GT360 also supports Flintshire's contention that the Commission should consider recommending: -

- The construction of a crawler lane on the A55 Northop hill between the Northop (A5119) and Holywell (A5026) Junctions
- Trunk Road Designation of the A548 Bridge and the A548 from Deeside to Prestatyn

The A55 crawler lane will reduce carbon emissions by reducing congestion and improving traffic flow. Trunking the A548 will improve resilience by transferring the cost of maintenance from the Councils who cannot afford to maintain the road and the bridge at the level required given its use as an alternative route to the congested A55.

Primary Changes and Improvements

GT360 strongly supports the Commissions approach to: -

- a) Improving Bus Services
 - Developing a Core Network
 - Improving Frequency
 - Extending Operating Hours
 - Delivering Faster Journey Times

- b) Giving Better Options to People Without a car
- c) Improving well-being by encouraging use of active travel and public transport
- d) Integrating Transport Modes
- e) Focusing on Transport “Corridors” for Fast and Frequent Public Transport Services (rail and bus) Over Extended Operating Hours

Integration (of rail, bus and active travel) with key railway stations as local, multi modal transport hubs is critical to offering a realistic alternative to car travel and enabling significant modal shift.

GT360 and the MDA are strongly supportive of the Commission’s proposed primary changes and improvements and suggest that the recommendations in the final report are focussed on delivering the recommendations in this section as priorities.

Rail

GT360 is fully supportive of the Commission’s proposals for rail, including the prioritisation of schemes for which GT360 is campaigning for with Transport for Wales and Welsh Government: -

- North Wales Coast mainline capacity and line speeds, phase 1 Chester to Llandudno Junction
- Chester Station Capacity Enhancements to enable more through services. This is critical to plans for more services between Cardiff, Shrewsbury, Wrexham and Liverpool as well as additional services on the NWCML.
- Borderlands Line investment to
 - Enhance the Hanson Cement Freight Sidings, thereby removing the blocking of the line by freight trains and enabling more passenger and freight services on the Line.
 - Enable increased passenger services on the line, starting with 2tph, by improving signalling, line speeds and safety at level crossings.
 - Develop joint proposals with Liverpool City Region for up to 4tph, using LCR CA Class 777 battery trains able to access the Liverpool Central loop line tunnels.

GT360 supports the proposals for: -

- Improving capacity between Wrexham and Shrewsbury by improving signalling
- Summer enhancements for the Conwy Valley Line along with fast bus connections prior to introducing more rail services.
- A new railway station to serve the Deeside Industrial Park
- Station works to create a more effective and convenient interchange between the Borderlands Line and the NWCML at Shotton.

Improvements to the Chester to Shrewsbury Line including the redoubling of the track between Saltney Junction and Wrexham General Station have been priorities for GT360 in the past.

Successful outcomes from investment in Gobowen need to be linked to the assessment of capacity between Wrexham General and Rossett, where the line has not been redoubled, and may therefore place a constraint on the future development of the new (Cardiff - Liverpool) services recommended by the Commission.

GT360 strongly recommends highlighting and supporting the implementation of proposals from Transport for Wales and the Liverpool City Region Combined Authority to work towards deployment of LCR CA Class 777 battery/electric trains on the Borderlands Line.

This would enable the enhancement of Borderlands passenger services to 4tph able to access the Liverpool Central Loop Line tunnels over time. Initial work by TfW and LCR CA indicate that these proposals would bring strong commercial returns based on access to the Liverpool Central Loop Line.

These proposals are deliverable with the purchase of additional Class 777 battery units, signalling upgrades, further safety enhancements to level crossings, platform upgrades and some battery charging infrastructure (likely to be at Shotton and Wrexham stations). They would bring economic and decarbonisation benefits to North Wales, Cheshire, Wirral and Liverpool and enhance connectivity between North Wales Coast, Liverpool, Deeside Industrial Park and Wrexham's employment centres via the proposed Shotton (NWCML and Borderlands) interchange.

GT360 commends the Commission's prioritisation of schemes where significant business case development has been undertaken and not diluting potential investment opportunities by introducing under-developed proposals for many new stations or the re-opening closed lines.

Prioritisation and laser focus on a relatively small and financially sustainable portfolio of enhancements is necessary due to the UKG's shortage of funds to invest in the railways. GT360's experience is that it will be a hard task to obtain investment from the UKG in the core rail network of North Wales and the MDA area without adding new "asks".

The Commission's report presents a strong case for delivering the North Wales Metro programme to improve public transport and active travel. The rail infrastructure and service improvements identified in the Commission's report align closely with the North Wales Metro programme. The final report of the Commission should consider using the "North Wales Metro" programme as the organising principle of its proposed interventions.

Growth Track 360 will work with Transport for Wales, Ambition North Wales and a future North Wales Transport Commission Delivery Board to seek funding from the UK Government for the rail investment proposed in the Commission's report.

Rail and the UK Government

Rail infrastructure is non-devolved and reserved to the UKG Government's Department for Transport. The DfT looks to Network Rail to maintain and manage rail network assets. This includes a formal role in proposing and delivering rail enhancements.

The Welsh Government is advised by Transport for Wales. The Welsh Government and Transport for Wales plan to integrate rail into its work to decarbonise transport by enhancing public transport services. This will require significant new rail investment in North Wales and cross border rail assets like Chester Station to enable more train services to run along the North Wales Coast, the Marches Line and through Chester onwards to Warrington, Manchester. Liverpool and Crewe.

The Welsh Government and Transport for Wales cannot deliver their aspirations for rail without funding being allocated by the UK Government. This represents a considerable barrier to improving rail services in North Wales and the cross-border area in the next 10-15 years.

At present the UK DfT's rail capital funds are committed for more than a decade or more ahead with significant commitments to deliver HS2 and the Integrated rail Plan for the North. The DfT is not bankrupt, but its forward capital programmes are in a similar state to those of the MoD, where overspends, inflation and over-ambitious aspirations to deliver numerous programmes pushes back delivery dates of committed projects many, many years into the future.

For this reason, the DfT has been unable to publish its proposed rail network enhancement pipeline for several years. The Treasury refuses to increase capital allocations, which means existing DfT commitments are pushed ever further into the future.

No capital money has been committed by the DfT to any investments in North Wales, Chester or the Borderlands Line, although some development money has been awarded through Network Rail (RNEP – NWCML) and a development fund created in response to the Union Connectivity review.

It should be noted that much of the rail development for North Wales has been funded by Welsh Government and Transport for Wales through its trailblazing and transport “best practice” North Wales Metro Programme.

GT360 cannot stress enough the need for the Commission to recommend that: -

- ***The UK Government’s Department for Transport is involved in rail development work for the Commission’s rail recommendations.***
- ***The UK Government is addressed directly by the Commission to give priority to its rail enhancement proposal for fairness in the distribution of rail investment and the cohesion of the Union in line with the Union Connectivity Review***

Bus

Many of North Wales’s core network, bus services terminate in Chester. To meet the needs of citizens on both sides of the border, and to support employment in the cross-border economy (MDA area) there needs to be ongoing collaboration and joint transport planning between local authorities in North East Wales, Transport for Wales and Cheshire West and Chester Council in particular.

Currently there is strong collaboration between Transport for Wales (TfW) and cross border partners like Cheshire West and Chester Council, the Liverpool City Region and the Cheshire and Warrington LEP. GT360 hopes that the Commission’s final report will reference the positive, ongoing cross border collaboration and lend its support to continuing collaboration, not only on rail but also on bus services and active travel.

Cross border working should be celebrated rather than underplayed, as in the current interim report.

The MDA and GT360 are concerned that Wales and Liverpool City Region will move to bus franchising, which GT360 is strongly in favour of, whilst Cheshire West and Chester (as part of the Cheshire and Warrington LEP) will not have equivalent powers and will be at the mercy of declining, commercial bus operators to the detriment of overall bus connectivity for citizens in a key transport corridor, into, and through, Chester. This is an issue that should be picked up and monitored in discussions in the governance bodies recommended by the Commission in its final report.

GT360 supports the Commission’s bus proposals for rural areas and looks forward to sharing learning from North Wales with GT360 partners in England, some of whom have substantial rural communities.

GT360 supports the proposals of the Commission for improved bus services and looks to the Commission’s final report celebrating the close cross border co-operation being led by Transport for Wales on improving bus and rail services.

Active travel

GT360 supports the Commission's contention that active travel routes need radical improvement to become better used. High quality networks, separated from the existing road network with revenue provision for ongoing maintenance and improvement would make cycling and walking far more attractive to the general population.

The Commission's proposals rightly focus on reducing barriers to active travel, such as a shortage of Local Authority staff to do design work and revenue funding for maintenance.

The Mersey Dee Alliance (MDA) is developing an active travel strategy that aims to propose a high quality, cross boundary active travel "trunk" network across the four local authority member areas. The strategy could act as an exemplar for other groups of local authorities.

Transport for Wales is a key contributor to the MDA's work and GT360 will share the strategy with the Commission when it is completed, which will be prior to the Commission's final report.

GT360 supports the Commission's proposals to improve active travel networks and usage in North Wales. The Mersey Dee Alliance will work with Transport for Wales and the proposed Delivery Board to deliver a high-quality cross border active travel network.

Integrated Ticketing

Transport for Wales operates rail services and stations that serve substantial English populations (Chester, Helsby, Frodsham, Gobowen, Shrewsbury and Neston and Heswall).

Likewise, the Welsh bus network serves many of these communities and helps people from England and Wales travel to work, services and cultural events across the England-Wales border.

TfW's integrated ticketing approach needs to be shared and developed in partnership with partners in the North West of England.

The need for cross border collaboration is well-articulated in the Governance section of the Interim report. Growth Track 360 and the MDA can provide vehicles for cross border collaboration for a future delivery board, the developing North Wales (Transport) CJC and Transport for Wales, who will be the guiding hand of transport planning and delivery in North Wales.

GT360 supports the Commission's proposals for integrated ticketing.

Enablers

Land Use Planning and Reform of Business Rates

The MDA identified town centre regeneration as a priority in its recent work for growing the MDA economy in response to the twin shocks of Covid 19 and Brexit. Therefore, GT360 supports the conclusions of the commission to review TAN18 in support of future permitted development that is less car centric and includes active travel and public transport connectivity between new housing developments and town centres. This is in line with transport planning best practice as articulated in the recent Transport for the North consultation on its Strategic Transport Plan for the North.

GT360 also suggests that it is time for governments to review business rates if they are serious about improving the competitiveness of town centres. Many studies in Wales supported by “lived experience” in Wales and England suggest that outdated property taxation for businesses is contributing to the decline of retail, office and commercial operations in town centres. Expensive town centre rents and business rates reflect a world of 70 years ago, rather than the modern retail and office environment, where out of town, car-centric developments enjoy huge competitive advantages.

The impact of internet shopping on town centres has also been huge with the transfer of sales from town centre shops to “out of town” fulfilment centres supported by a significant delivery infrastructure of vans and lorries, creating a new demand for congested road space.

A restructured business rate/property tax regime could address these market shifts and implement economic drivers to underpin the revised planning policies advocated by the Commission.

The MDA recently reported from its Active Strategy work that many practitioners believe that compulsory purchase will be an essential tool in the drive to create high-quality, dedicated cycle and walking ways.

GT360 suggest that the Commission incorporates the reform of business rates and the use of compulsory purchase for the land assembly necessary for active travel routes into its recommendations on Land Use Planning for central and local government.

Fleet Decarbonisation

GT360 supports the Commission’s aspiration to decarbonise bus and train fleets over time. This will require governments to support the process, as zero emission buses (hydrogen and EV) are currently more expensive to run than current diesel models, whilst rail electrification requires high levels of upfront capital investment.

GT360 looks to accelerate the electrification of the North Wales Coast Main Line, seeking the most cost effective “whole life” solution which is currently overhead line electrification.

Park and Ride

GT360 believes that park and ride can play a positive role in encouraging modal shift and reducing cars in town centres.

Short journeys from home to park and ride facilities (train or bus) will give choices to local people on how they access public transport. It also gives consumers of transport more control over their contact with, and access to, good quality public transport whatever the weather.

Visitor Economy

GT360 has concerns that the Commission has not fully captured the impact of tourism journeys on North Wales’s transport infrastructure.

The data used in the initial report in January 2023 seems to be chiefly derived from the census which better captures the movements of residents than visitors. This is a key point, as much peak congestion on the access points to North Wales – the A494 Dee Bridge (where the road switches from 3 lanes to two), the A494/A55 interchange at the top of Aston Hill, the A5/A483 Halton roundabout at Chirk – are generated by visitor, tourist traffic.

The congestion then often carries on along the A55, A483 and A5 all the way to Bangor, the Anglesey bridges and Betws-y-Coed. The A548 coast road (Flint to Rhyl) is also similarly affected.

GT360 is supportive of the Commission's ideas for tourist travel hubs and building travel options into ticketing arrangements for attractions.

Delivery Scepticism

The Commission's Interim Report references "delivery scepticism." This was articulated in contributions to the discussion of the Commission's Interim report by the GT360 Board.

Dependency on UKG to deliver rail enhancements.

The report's recommendations on rail infrastructure will depend on funding from the UK Government as rail infrastructure is non-devolved. Following a catalogue of cost overruns on the UK's major rail schemes, the UK Department for Transport's rail investment programme is over-committed and will not have money available for new investment for over a decade from now unless a future government allocates more investment (e.g., Labour's proposed Green New Deal, which contained a provision for a rail electrification programme).

Financial constraints on the DfT are highly relevant as the NWCML needs capacity improvements to run the regular clockface stopping services every 15 minutes plus one express train an hour. However, the capital investment required for Phase 1 of upgrading the NWCML is relatively low in the context of rail investment, which gives cause for cautious optimism.

Despite campaigning by GT360 and excellent "industry" standard business case work by Transport for Wales and Network Rail's Wales and Western Region, the priorities supported in the Commission's Interim report are a long way from being funded by the UKG for delivery, despite aligning with key UKG policy goals of improving Union Connectivity and Levelling Up.

Short term crisis in public transport revenue funding leading to deteriorating service levels.

Public Transport is currently in a state of crisis following Covid 19 and high inflation. Covid 19 has reduced and changed the usage patterns of both rail and bus services. Services were kept going through Covid by emergency subsidies. As these subsidies are withdrawn rail and bus services are being reduced across the UK. This suggests that Welsh Government's aspirations for improving public transport, active travel and integration of modes will depend very much on a similar policy being adopted in England by the UKG which would then generate the Barnett Consequentials for Welsh Government to implement their proposals, which will include the recommendations of the Commission.

In common with much of the rail industry, Transport for Wales is not only dealing with reduced fare revenue but is also affected by late delivery of new rolling stock and technical problems across its fleet. Fires on the Class 175s locomotives led to their withdrawal from service. This caused inadequate and inappropriate rolling stock to be used in their stead in North Wales and on the Marches line. The new Class 230s purchased for deployment on the Borderlands Line were delivered late and are experiencing operational problems. Refurbished rolling stock purchased to provide loco-hauled premium services between North Wales and Cardiff are not working properly leading to delays and cancellations of services.

Avanti West Coast are at the heart of a major industrial dispute between the UKG and the rail unions. Industrial action, shortages of drivers and withdrawal of subsidies have seen unreliable and reduced service levels provided by AWC.

These near-term problems with public transport are driving passengers onto the roads. They are increasing “transport exclusion and isolation” from employment and social activity. Far from public transport becoming more competitive with the car, it is now becoming less so, with fewer and less reliable services, which are often overcrowded and uncomfortable.

Shortage of Capital

The Welsh Government has adopted a narrative around the roads review that they no longer have the capital to deliver what was planned for the roads programme. If that is the case, the public and stakeholders can have little confidence that there will be sufficient capital to undertake major investment programmes for active travel or bus priority in Wales.

There is a substantial overspend on the planned upgrade of the Core Valley Lines in South Wales. This and UKG DfT Rail overspend, will detract from capital being available for other regions outside South Wales, including North Wales and Chester.

Welsh Authorities have published aspirational active travel maps. The Commission’s data indicate that around of 25% of those networks have been achieved. Much of the existing network is to standards that do not encourage more people to cycle. There is clearly a long way to go to deliver the desired active travel networks.

Need for a “Turnaround” of public transport.

The long-term credibility of public transport and active travel to decarbonise transport will now require a major “turnaround” of how public transport is funded and perceived. This process is unlikely to begin until after the next general election and a new comprehensive spending review in 2025/26 which will not significantly influence spend until 2026/27 at the earliest.

Wales is unlikely to be able to afford a significant push to decarbonise transport and implement the recommendations of its “Burns Commissions” until the UK Government begins to do something similar in England, which will then generate the Barnett Consequentials for Wales, which could be invested in Commission recommendations.

Wales cannot afford to take on rail infrastructure investment without devolution of the function and 5% of the rail infrastructure budget from the UKG. Devolution is unlikely as the UKG DfT cannot afford to lose 5% of its budget to Wales now or in long term.

What to do if there is no capital for delivery?

There will be the opportunity to use the next 2-3 years to undertake detailed business case development work for when capital funds (potentially) become available. The Welsh and UK Governments need to ensure that development funding is allocated to progress the priorities identified by the Commission.

Fare Levels and Revenue Subsidies for Public Transport

The Commission makes excellent recommendations on integration of Ticketing. However, the level of fares is high both for bus and rail. Modal shift is unlikely to reach the levels necessary to meet Welsh Government targets (45% by sustainable modes) without action to reduce fare costs.

The UK will need to adopt the philosophy of transport as a public service, with significant capital and revenue subsidies, to enable regional, and large urban area, rapid mass transit systems on a European model. Subsidies will deliver the positive outcomes of decarbonisation, reduced pollution, better health and safer and more attractive cities and towns. They will be essential to achieve modal shift and may need to be financed by taxation/road pricing of cars and/or carbon use.

The Recommendations

GT360 supports all the recommendations in the draft report.

- Recommendations to develop facilities for HGV drivers are strongly supported. Current national provision across the UK is poor and both drivers and communities will benefit for recognising the need for improvement.
- GT360 emphasises the importance of recommendation thirty-six which advocates cross border collaboration being built into governance structures.

GT360 is concerned that there are too many recommendations in the report at 49, which will require substantial resources to Programme Manage, when handed over to the proposed Delivery Board.

- Rationalisation could be considered for the “enablers,” where strategic advice is provided to Welsh Government and stakeholders on wider issues on planning, digital connectivity, behaviour change and freight.
- Recommendations on micro-mobility and arrangements to share assets (like car clubs, bike sharing and loan polls etc.) might also benefit with more focus on specific proposals for pilots managed and promoted by TfW as part of the North Wales Metro Programme. Local Authorities could then spin out successful pilots across North Wales

GT360 recommends that the Commission: -

- ***Identifies a “Top 5-7 programmes” which incorporate and prioritise recommendations for the Delivery Board to work on.***
- ***Seeks a commitment from Welsh Government for ongoing development funding for the identified programmes to be allocated to Transport for Wales with governance for the work provided by Delivery board working in partnership with the CJC, local authorities and other partners, including cross border partners.***

Annexe: Evidence and Data

Observations on Data and Data Queries

The Commission published a report in January 2023 which reported data sets for North Wales and three sub-regions: -

- West: Gwynedd and Anglesey
- Central: Conwy and Denbighshire
- East: Wrexham and Flintshire

This enabled the commission to draw out the themes from across the region that covered: -

- Rurality
- The nature of journeys (including length and the propensity of cross border travel)
- Quality of public transport services across the region
- Where congestion occurs in the region
- Modal share
- Barriers to the use of public transport and active travel
- The impact of tourism

This work influenced the preparation of the interim report.

Census Data is Limited

It appears that the data on modal share and journeys is based on census data. Census data will capture regular cross border movements of people who live in the local authority areas of North Wales, so in Wrexham and Flintshire 18% of journeys involve crossing the border into England.

The MDA uses a census derived figure of 40,000 cross border movements in the MDA area (i.e., movements into and out of Wales which includes people who live in England but work in Wales. Llwybr Newydd identified 200,000 cross border movements per day using mobile phone data.

Reliance on census data will hugely underplay cross border movement and cross border usage of North Wales's Road assets.

Engagement and Public Attitudes

The Commission's work with stakeholders has been good.

The report references behaviour change. The final recommendations of the report could be enhanced by doing some work on public attitudes and perceptions that may be barriers to the Commission's report.

The interim report is very much aligned with a transport planners view of the world without much discussion of how to take the public along with its vision. A statement of public attitudes and how changes can be "sold" to the public will help address the issue of "behaviour change."

Quantifying cross border usage of North Wales's Transport Infrastructure

The Commission's report identifies: -

- 3.7m overnight tourist trips per annum prior to Covid, most of which were by car.
- Substantial commercial traffic associated with the Holyhead Port land-bridge.

These traffic movements have a significant impact on carbon emissions in North Wales and strategies for reducing carbon emissions will need to address cross border traffic in partnership with the neighbouring authorities represented by Growth Track 360.

It appears that the commission has not been able to quantify the incoming traffic which the North Wales transport infrastructure has to accommodate for the good of the regional and UK economies.

Is the Commission able to quantify/estimate the additional traffic from tourism and freight movements over and above census data in a way similar to how population growth is estimated for particular places from tourism or students in university towns?

Sector Usage of North Wales's Road Infrastructure

The Commission identified modal shares by car, public transport, cycling and walking, again this presumably was taken from census data. Is the commission able to quantify use (Market share) of the road network by sub-region for the: -

- The private car
- Light commercial vehicles
- Heavy Goods Vehicles
- Buses
- Bicycles

These issues are relevant because in the cross-border area tourist traffic mixed with commuter/work traffic is a cause of the worst congestion on the: -

- A494 Corridor up the Aston Hill to the A55
- A483/A55 Junction (Holiday Inn/Chester Business Park Roundabout)
- A483/A5 Corridor (Halton Roundabout)
- A547 Coast Road (Queensferry to Flint)

All these pinch points are routes for heavy goods vehicles and commercial traffic. They are related to North East Wales's close association with Chester.

Chester as a Major Transport Hub for the MDA Area

Chester is the road and rail gateway to North Wales. The City of Chester is also a major centre of employment for people living in North East Wales along with Wrexham and Deeside Industrial estates. Likewise, many people from Chester travel to Broughton, Deeside and Wrexham for their work.

It was disappointing to see how the "congestion hot-spots map" in the initial report did not feature Chester on the map as much of the congestion relates to navigating the roads around Chester such as the A494/M56, A5117, A550/A41, A55/M53. Therefore, the information presented was stripped of its essential meaning.

GT360 recommends that in the final report there is a more explicit recognition of the need to work with partners in Cheshire West and Chester to apply modal shift to cross border traffic flows into Wales from England, so that traffic travelling into Wales can be offered travel options that reduce their carbon emissions in Wales.