

**SWIFT**

**SOUTH EAST WALES  
TRANSPORTATION  
FORUM**

**TIGER**

# **POLICY REVIEW OF PUBLIC TRANSPORT**

**Response to the National Assembly for Wales  
Environment, Planning and Transport Committee**

**Consultation Report**

**OCTOBER 2001**

**Blaenau Gwent County Borough Council : Bridgend County Borough Council  
Caerphilly County Borough Council : Cardiff County Council  
Merthyr Tydfil County Borough Council : Monmouthshire County Council  
Newport County Borough Council : Rhondda Cynon Taff County Borough Council**

**Torfaen County Borough Council : Vale of Glamorgan Council**

*Note : this is a word processor version of this document. It differs from the published version only in the format of the front cover and Appendix 3 showing the proposed management model. In the published report, these pages are in colour.*

## **POLICY REVIEW OF PUBLIC TRANSPORT**

This report has been produced on behalf of the three local authority led transport consortia in south east Wales - SWIFT (South Wales Integrated Fast Transit), TIGER (Transport Integration in the Gwent Economic Region) and SEWTF (South East Wales Transportation Forum).

The report has been produced under the aegis of the member led groups who oversee the work of the three consortia.

We believe that developing the existing consortia, with their excellent track records and proven ability to develop partnerships, provide the best way forward to improve public transport in accordance with the aspirations of the public, the local authorities and the National Assembly.

We would welcome the opportunity of meeting with the members and the officers of the National Assembly to further explain and discuss the contents of our response to the committee's review.

## POLICY REVIEW OF PUBLIC TRANSPORT

- 1 This response is submitted jointly by the three local government transport consortia in south east Wales. Our response will show why a joint submission is appropriate. References in our response are to the Committee's Policy Review of Public Transport, unless indicated otherwise. We attach in appendix 1 our response to the check list in annex 4 of the Policy Review (this comprises a set of comparisons between regional consortia and PTEs). Our Appendix 2 contains our response to the questions in the Policy Review chapter 7. Our Appendix 3 summarises the organisational structure we see as being appropriate to the development of SWIFT and TIGER within the context of public transport improvements in south east Wales.
- 2 The foreword to the report is from Richard Edwards AM, chair of the Environment, Planning and Transport Committee. In the report he states:  
  
'We want public transport in Wales to be integrated, accessible, affordable and an attractive alternative to the car.....This calls for a visionary approach backed by considerable resources to address historic levels of under investment...We believe transport planning should be brought onto a regional basis and that.....funding should be targeted to deliver regional priorities, while not overlooking local needs. The voluntary groupings of regional public transport consortia should be strengthened to deliver improved services.'
- 3 We welcome these sentiments. The regional consortia have achieved much in their short existence. In the light of the growing financial and political support for their objectives, we recognise the need to strengthen our organisations internally, by closer ties with each other and with the National Assembly. It is the need to produce closer ties between SWIFT and TIGER, and also with SEWTF in the context of other modes, that causes us to submit a single joint response. We also welcome the recognition of historic under investment and look forward to working with the Assembly to redress this. We would wish to discuss our response with the Committee and all parts of the National Assembly having an interest in promoting public transport in south east Wales.
- 4 We see the main functions of an organisation charged with delivery of better public transport across a wide area as being:
  - i To facilitate, in co-operation with others in the public and private sector, the provision of public transport the public want to use;
  - ii To ensure services are delivered to an agreed standard;
  - iii To deliver the local authority and National Assembly's public transport strategy;
  - iv To operate an effective and efficient support organisation providing best value and best practice on a consistent basis;
  - v To prepare an agreed capital programme;
  - vi To be politically and financially accountable.

- 5 The existing consortia demonstrate many strengths illustrating how they already deliver this service.
- i Members have shown considerable willingness to work towards a common regional aim and to subjugate immediate local interests to longer term collective goals. Chairmanship of the consortia moves to another authority each year. That maintains a high level of member interest and commitment.
  - ii They are consensual groups thereby strengthening the collective desire to deliver results.
  - iii The consortia are becoming models of joint working that the public transport industry respects and feels comfortable working with. The working relationships between local authorities, NAFW and the industry are effective and efficient.
  - iv They are delivering better services.
  - v They have established joint working units where they are appropriate. Gwent Consultancy, Glamorgan Engineering Consultancy, and the Gwent Joint Passenger Transport Unit are all pooled technical resource units. The success of each results from technical competence in specified fields, effective and efficient management and high political sensitivity to the needs of the controlling councils.
  - vi They have demonstrated the value of good contacts with other local authority services, for instance land use planning, traffic management and professional service support.
  - vii They have shown a high level of responsiveness to short term demands of a political and technical nature. The high quality of their work is seen both in what they have achieved and in the quality of their planning and management.
  - viii They are cheap to run and can be further developed without additional legislation. But cheapness should not be pushed to far - cutting costs too far leads to reduced effectiveness.
- 6 One of the strengths of the consortia is their ability to deliver at a local level. For instance:
- i Bus priority lanes in Newport. Prior to reorganisation Newport Borough Council was unwilling to pursue a similar policy put forward by Gwent County Council. Now it is part of the council's overall transport and environment policy and they are prepared to work to overcome the many detailed difficulties.
  - ii Caerphilly SMART card initiative. The project works because of the detailed hard work put in on the ground. SMART card use for public transport is being widened across the region : their use to market a wide range of local authority services is being considered.
  - iii Cardiff real time information system. This is part of a wider range of improvements to public transport carried out within the general work programme of the local authority.
  - iv Both SWIFT and TIGER have identified a 20 year strategy of improvements including new stations, station improvements, new services and other infrastructure improvements. Many of these can only be made to work as part of the constituent councils' planning and traffic management policies and programmes.

- v The production of a saleable business plan for the Ebbw Valley rail project shows the timeliness of the consortia's efforts.
  - vi Parking guideline standards. A parking policy that is favourable to public transport is a major plank of the public transport strategy. An authority having responsibility for both is far more likely to achieve the best balance.
  - vii Walking and cycling are of great importance to the public transport journey but are fundamentally local issues.
  - viii Clearly a common policy is required so that each end of any cross border journey is provided for on a consistent basis. This can be dealt with best by local authorities working to an overall standard and agreed wider regional policy.
- 7 Before discussing what changes we propose to the political management of the consortia in south east Wales, we set out what we believe is the role of NAFW in improving public transport. Our view reflects the current division of responsibilities : NAFW sets national policies and holds many of the purse strings : local authorities set local policies and co-ordinate activities : the private sector operates most services commercially.
- 8 NAFW has key roles to play if public transport is to improve. Its acceptance of those roles, and how it discharges them, is central to the way that local authorities manage themselves. The proposals in this paper presuppose certain actions by NAFW.
- i That the Assembly continues to offer long term political commitment to improve public transport and provides leadership in the debate at a national level.
  - ii That the Assembly takes unto itself the responsibilities discharged by the Strategic Rail Authority and the Traffic Commissioner, both of which are currently England based organisations.
  - iii That it continues to fund, out of its capital budgets, the improvements needed to the system. That funding stream will have to be at a higher rate if a high proportion of the Assembly's aspirations are to be met in a reasonable time scale.
  - iv That it increases revenue budgets available for public transport and resolves with the WLGA a mechanism for steering those monies into an agreed service improvements programme. A large part of the past under investment in public transport is on the revenue account. This problem has to be tackled if progress is to be made. Local Transport Services Grant (formerly Bus Subsidy Grant) achieved much, precisely because it was ring fenced.
  - v That it operates funding rules that ensure effective use of monies from its capital and revenue accounts and the maintenance of capital assets through appropriate levels of local authority revenue spending.
  - vi That it contributes to the details of the national debate on how to promote and improve public transport at all levels on an equal basis with its other partners. It should not presuppose that some over-riding national need subjugates local priorities nor should it frustrate contributions from others on the direction of national transport policy. The way the consultation on the Transport Framework has been conducted is a good example of how the Assembly can show leadership and at the same time ensure an inclusive approach to policy development.

- 9 Our proposals to modify the current political management of public transport assume this role for NAFW, the status quo as regards legal responsibilities and an evolution of the present structures of SWIFT, TIGER and SEWTF. In summary we propose:
- i To continue to operate TIGER and SWIFT as operational units with responsibility for detailed programmes in their areas;
  - ii To create a Public Transport Board with wide membership, and primacy to develop and coordinate strategy and to ensure all public transport developments in south east Wales are carried forward on a sustainable basis;
  - iii To strengthen the officer support base and to put its organisation and management on a more formal basis.
- 10 The model we propose is shown in Appendix 3. Total membership on the board should be such that no one group outnumbers the others. NAFW must determine its own position as regards its members' involvement in the Transport Board but the local authorities would welcome their participation. AMs and supporting officers as appropriate potentially bring a national and regional perspective to the proceedings and they can heighten the profile of public transport within the workings of the Assembly.
- 11 The board would need terms of reference and voting rules, although these should relate to the board's business, not that of its component memberships ie NAFW still allocates capital, advised by the strategy; LAs still specify their contract services, within the agreed standards and protocols; bus companies still make investments in new buses, according to their commercial criteria.
- 12 We offer the following additional comments on the political management process outlined in appendix 3.
- i The Board would have, as its primary focus, improvements to public transport. This will include major transportation issues, such as regional parking policy and the creation of highway conditions favourable to buses, having a material impact on the efficiency and effectiveness of public transport.
  - ii The Board would also cover the issues within the present remit of SEWTF - for instance cycling strategy and reclassification of the strategic road system.
  - iii We intend to continue to operate SWIFT and TIGER, giving them responsibility for the formulation of the detailed plans to improve public transport in their areas and within the policy and strategy determined by the Transport Board. The local authorities consider the consortia and partnerships should be built on. The consortia have well developed individual strategies that reflect local needs and local geography.
  - iv We see an important difference between policy and strategy on one hand (for instance the setting of standards, value for money criteria and the general direction of public transport policy) and delivery (for instance determining the order in which projects are implemented and monitoring of progress towards agreed regional aims). That difference underlines our intention to maintain the two consortia operating under the common flag of the Transport Board. It builds on past success and gives more certainty of delivering good quality across all of south east Wales.

- 13 NAFW accepts it does not dictate the details of the programme : it vets the policies of the consortia, exercises financial control in many areas and keeps a keen eye on getting good value for money but is not constrained by detail. Effectively, NAFW should agree to major capital programmes, be party to setting standards including maintenance whereas the Consortium must concentrate on delivery.
- 14 NAFW wishes to have greater certainty over outcomes and to ensure that policies are delivered on a consistent basis. The Committee, in its Consultation Report, touches on the question of 'Compacts' between the Authorities within the Consortia and the Assembly. We support the concept of the compacts. They would be used for capital management much as at present, and to define standards and protocols for the provision of revenue related services. These should relate to capital asset maintenance, thresholds for contract intervention, bus quality partnerships, works agreements with Railtrack, concessionary fares policy, information and publicity standards. Most of these matters are already handled on a consistent, if informal, basis by the 10 local authorities in south east Wales.
- 15 The Consultation Report questions whether such compacts need to be underpinned by statute. The idea of Compacts is attractive since it would commit authorities very positively and should overcome any future tendency of one Authority to undermine the overall strategy by withdrawing support in some way. Nevertheless the great strengths of the proposed organisation is that it would continue the successful consensual basis. Voluntary compacts would extend the commitment and would be helpful. Underpinning these by statute would be overkill. If in the future proposed arrangements were found not to be working, that would be the time to consider legal under-pinning further.
- 16 The proposed officer organisation for delivering the goods will be based around existing structures and still focused on the two geographic areas of SWIFT and TIGER. The structure can be strengthened by:
- i Expanding the core administrative staff for SWIFT and TIGER and fostering closer working between the two groups;
  - ii Establishing joint working relationships on technical specification work, such as standard designs, simpler contracts, common publicity standards and so on. This is already done to an extent but there is scope to go much further in this area.
  - iii Forming closer links between the collective arrangements that already exist - these groups include the joint consultancies, the Joint Passenger Transport Unit and the Mid Glamorgan contracts management group.
  - iv Skilled transportation staff are currently at a premium so it will be important to develop a flexible organisation which can react appropriately to changing demands, but one which has a clear remit and vision for all its staff.
- 17 We offer the following additional comments on appendix 3 related to the technical management of work:
- i We see the technical support of all the regional transport work as a concerted effort by all those concerned. The success of the regional efforts in south east Wales reflects two factors. First local authorities have been willing to subjugate their individual immediate short term interest towards a longer term

regional good, on the understanding that their local interest will be delivered within the overall programme. That process really does work. Secondly staff within the local authorities find collective effort genuinely stimulating and rewarding. They learn from each other and know that cooperation delivers a more professional product. There is a high level of mutual trust at an officer level; that trust underlies the success of these regional partnerships. The same can be said of the relationships between local authorities and the transport industry.

- ii The issue of service delivery at a local authority level is best achieved by gaining agreement on delivering services to defined standards and leaving each local authority to deliver that service in the manner it judges most appropriate to its own circumstances. There are many examples of the success of that approach. These include the Gwent Joint Passenger Transport Unit and the Mid Glamorgan Contract Management Group.
  - iii There is a cost associated with the technical support of the Board and SWIFT and TIGER which operate under its aegis. Accounting for those costs is a matter that requires more work. Currently NAFW funds some of the capital related staff cost through Transport Grant. That source is not available for those aspects of regional cooperation related to revenue spending.
- 18 These proposals have the following benefits:
- i A new and more appropriate structure will be established which brings together the NAFW, SWIFT and TIGER and the responsibility to manage the wider regional strategy.
  - ii Compacts will be established to define standards and commitments between local authorities and with NAFW.
  - iii Closer co-operation will be established between the executive parts of the structure.
  - iv It avoids time consuming primary legislation and ensures early progress of the programmes.
  - v It builds on current successes rather than trying to start from scratch.
  - vi It will permit more strategic consideration of bids for grants.
  - vii It will maintain local delivery and accord with Community Plan and Local Transport Plan philosophy.
  - viii Good and relevant public /private partnerships will be maintained.
- 19 The consultation document asks for views on the efficacy of PTEs. We respond to this in two ways; first by repeating part of our response to the Transport Framework consultation and second by examining the check list in annex 4.
- 20 Our first comment is a general one; a PTE is primarily a purchasing organisation. Many people do not know this; they often think a PTE is a very large municipal bus undertaking which was one of the main reasons why they were first set up. A PTE does not run services and can have only marginal impact on the commercial market.
- 21 Our Framework document response sets down our views on the usefulness of PTEs. We believe a PTE, either for south east Wales or as part of an all-Wales PTE, is unwarranted for the following reasons:
- i Local authorities have a range of powers that affect public transport provision,

- particularly the links with schools and social services transport. They would become less well coordinated at a local level if local authorities lost their public transport powers.
- ii Local authorities are charged with preparing local transport and community plans. A PTE would be divorced from that process and miss the opportunity to make public transport relevant to these plans.
  - iii The SWIFT and TIGER consortia are demonstrating how effective partnerships can be set up without the need for large central bureaucracies.
  - iv Deregulation of the bus industry removed one of the main reasons for having PTEs. They can no longer operate bus services, they can only purchase services from others.
  - v The experience of some English PTEs, post local government reorganisation, is that they have proved particularly difficult to manage politically. Even prior to LGR they proved difficult to manage politically.
  - vi Regional public transport groups (which will develop from the new regional local authority consortiums) can offer all the effective advantages of a PTE at a fraction of the cost. It would be more sensible to see how they work out before changing to a much more expensive system that will take a long time to set up.
  - vii If Assembly members led the PTEs, rather than local authority members, they would be unique in having no parallel in either other PTEs or in other Assembly responsibilities.
  - viii The remoteness of these groups as political bodies goes directly against all the reasons why local government was changed in 1996. There is a lot of evidence that the local government aspect of public transport provision has moved closer to people since 1996 and that is a good thing. A PTE would appear as another bureaucracy.
  - ix Judging on staffing levels in English PTEs, a south east Wales PTE would employ about 150 people. Local authorities could deliver the same effective service with a modest increase in their present staff numbers.
  - x There would inevitably be setting up costs associated with a PTE. The Assembly would find itself funding a management process when it wants to put more money into front line services.
  - xi Unless funding of public transport is substantially increased, and guaranteed over a long period of time, there is no reason to even consider PTEs. A large funding increase is a prerequisite to even considering change. Without that funding increase, none of the supposed advantages of a PTE could ever materialise.
  - xii There are a number of procedural problems in setting up a new PTE. New legislation would be needed.
  - xiii Any attempt to set up PTE's would take at least 5 years and leave public transport developments rudderless in the meantime.
  - xiv Best practice in local government shows that the aims of a PTE are achievable through present arrangements and institutions, suitably strengthened by the increased powers in the Transport Act 2000 and by additional funding. Where local government is failing to deliver (and that nearly always happens because budget priorities do not allocate sufficient resources to a task), it should move to best practice. Removing powers is the wrong way of tackling any such failings.

- 22 Our response to annex 4 is in Appendix 1. This is brief but we offer the following additional comments. The apparent success of PTEs is the result of substantial levels of funding over many years and their powers to initiate major rail projects. In their areas the PTE's have the Strategic Rail Authority's powers to fund projects and support services. The South Wales authorities would support the Assembly in attaining these powers. The Consultation Report (para 2.15) notes that the Assembly does not have any regulatory powers affecting the operation of public transport services, which are the responsibility of the DTLR. The acquisition of these powers would however enable the Assembly to bring added strength to supporting the local Rail strategies.
- 23 A PTE's strength springs from its presence as one formal body providing services across a wider area than its constituent authorities. It consequently will score well under those headings where regional order is most important - for instance some aspects of bus service co-ordination and information. A PTE also offers a better staffing structure providing career paths for public transport staff within the organisation and a "critical mass" for developing specific areas of expertise. It also may attract higher capital funding than voluntary pooling which is what a consortium is, if only because a PTE cannot be justified without higher funding. A PTE implies "commitment". Those are all advantages of a PTE but they can also be achieved within the strengthened proposed local authority consortia.
- 24 In terms of the Annex 4 checklist, the consortium approach offers two overwhelming advantages. First, a PTE has no ancillary powers, particularly relating to planning and highways management. A PTE would be remote from both these functions and consequently little able to influence them. Second a PTE would require primary legislation. It would take 5 years to set up and would cause a hiatus in public transport development, just at the time when greatest action is needed. Creating a PTE would damage the immediate prospects for implementing Assembly public transport policy and create a long term environment in which public transport might not receive the wider consideration it deserves.
- 25 We believe these factors alone make a PTE a much worse option than our proposed approach of delivering the public sector aspect of public transport through regional consortia centred on local authorities. Essentially our argument is "evolution not revolution".

APPENDIX 1 - TESTS FOR ALTERNATIVE ORGANISATIONAL STRUCTURES

REFERENCE ANNEX 4 OF THE ASSEMBLY DOCUMENT

<b>Test</b>	<b>Regional Consortia</b>	<b>PTE</b>	<b>Which better?</b>
Relevance to area	Better integration over all services	Closer geographic coordination	Little to choose
Accountability	More part of mainstream local government	More remote from mainstream	Consortia better
Development of an integrated PT network	Much better integration across other modes and wider planning issues	Better service integration	Little to choose
Quality of political decision making	Mainline integration with other activities. No difference in quality of members involved.	Single service provider - little relevance to other services. No difference in quality of members involved.	Little to choose
Effective rail powers	Regional consortia known to be liked.	Well tested mechanism.	Little to choose
Effective bus powers	Reliant on good will of individual LAs.	Raison d'etre of a PTE.	PTE considerably better
Effective highway powers	LAs very strong	PTE little influence	Consortia by a large margin
Influencing land use planning	LAs very strong	PTE very little influence	Consortia by a huge margin
Impact on passenger travel	Dependent upon agreed joint action	Opportunities for "one voice"	PTE better
Capital	Access to a wide range of sources. Strong bidding teams.	Good coordination, divorced from mainstream LAs process	LA slightly better
Revenue	Variability in positions of different LAs.	Significant problems in getting LA agreement. OK if NAFW funds direct.	Depends upon mechanisms used.
Achieving best value	-	-	Almost entirely dependent on other factors.
Skills	Can be addressed with appropriate pooling and expansion of staff resources.	High levels of expertise in various specialisms	The same if new consortia arrangements are introduced.
Easily established	Comparatively easy.	Major problems. 5 years to establish and consequent problems on an interregnum.	Consortia by a huge margin.
Stability	Good, if Assembly uses its powers in conjunction.	Possible problems with many small partners sharing what some see as a marginal service.	Consortia by a fair margin.

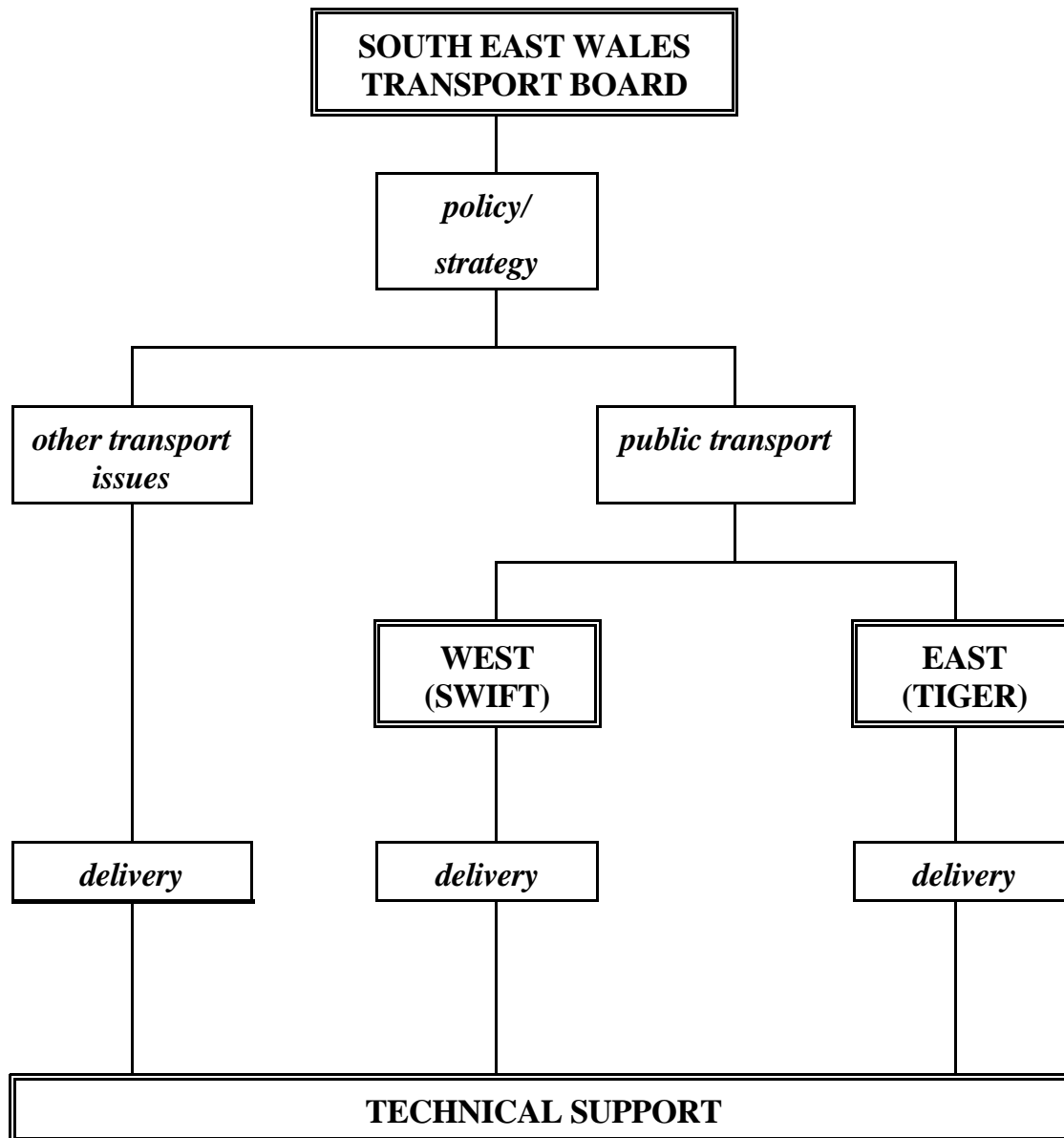
## APPENDIX 2 - RESPONSE TO RECOMMENDATIONS OF CONSULTATION REPORT

Recommendation	Response
<i>1: that a quality kite mark be developed as part of the work being undertaken on quality partnerships and contracts, initially covering bus services, and extended to include community transport, rail and other modes.</i>	We agree to this proposal but considerable work is needed to ensure that the implied quality standards will both raise the level of services and be achievable by the majority of operators. The suggestion is not deliverable if that balance is not achieved.
<i>2: that the National Assembly, local authorities and transport operators should address historic levels of under investment in public transport.</i>	We see this as being central to achieving the agreed aim to improve public transport. But it is much easier to make the statement than to achieve the aim. To be successful, NAFW will either have to increase the size of the public sector cake (which will be very difficult given its limited fiscal powers) or find ways of channelling money into public transport at the expense of other public services. The problems associated with either approach must not be underestimated.
<i>3: that the National Assembly and local authorities working together with operators, passengers and other stakeholders take forward these priorities as funding allows:</i>	We wholeheartedly endorse the principle of partnership. This forms the entire basis of the consortium approach. All considerations under this heading have to recognise funding limits. Unless NAFW increases budgets, few of these proposals will make much progress. Early value for money studies should form part of all the implied studies.
<i>3a - extend the concessionary fare scheme to include community transport, and taxis on a limited basis, and consider the opportunity to support travel by young people;</i>	Fine in principle but value for money and best practice must underlie all these ideas.
<i>3b - pilot "all mode" information centres across Wales;</i>	Carry out in conjunction with PTI Cymru.
<i>3c - feasibility studies for second generation public transport, such as light rail schemes;</i>	This needs a common cost comparison basis and should include innovative bus schemes and "cheap" community transport schemes.
<i>3d - establish an overarching all Wales passenger group to cover all modes of public transport;</i>	If this group is to have a purpose, it must have specified terms of reference and an agreed detailed purpose prior to its establishment. This will be best achieved by a preliminary task and finish group.
<i>3e - develop interchanges between modes of public transport;</i>	Agreed but should be part of 10 year regional PT plans.
<i>3f - develop park and ride facilities;</i>	as above
<i>3g - set up a school transport demonstration project to consider long term procurement for bespoke school buses;</i>	This will be expensive and it has to be questioned whether this will offer as good value as other proposals for the very limited budgets available. Any demonstration project should have as its first phase a detailed costing exercise. American style "yellow school buses" are very expensive.
<i>3h - improve long distance provision within Wales.</i>	We sympathise with this concept but the proposal implies a shift in the policy balance between improving availability in areas of little current demand (accessibility) and increasing provision in marginally profitable corridors. The former may have the highest social worth and the highest cost. Current practice aims at maximising the number of passengers and not at improving accessibility.

Recommendation	Response
<p>4: that local authorities prepare regional public transport strategies by April 2003 reflecting bus strategies (which are a statutory requirement) and including developments on rail and community transport. These should be prepared on a regional basis to reflect travel patterns in so far as possible.</p>	<p>Agreed.</p>
<p>5: that regional transport strategies should guide decisions on funding made by the National Assembly and such investment should be targeted alongside local authorities' own investment to achieve maximum effect. Additional expenditure on transport would be justified only on this basis and where results can be monitored and evaluated.</p>	<p>This is a sound basis for moving forward. But it must be recognised that many of the ideas in recommendation 3 will not provide short or even medium term realisable results. NAFW must decide whether it wishes to support projects that are most likely to be "justified only on the basis of maximum effect and where results can be monitored and evaluated" or on projects that expand availability and opportunity but where take-up is uncertain. NAFW must get real.</p>
<p>6: that each consortium agrees with partners, including the National Assembly, how objectives in the regional public transport strategies will be delivered, taking into account linkages with Local Transport Plans (including cross-border travel patterns) and the availability of funding.</p>	<p>We agree with this approach. It is implicit in our proposal to develop the regional consortia.</p>
<p>7: that local authorities consider how they would establish more robust regional consortia building on existing arrangements so that the National Assembly's vision and regional public transport strategies can be implemented, taking account of local needs and the availability of resources.</p>	<p>We agree with this approach. For details see our main text.</p>
<p>8: that as part of this consideration local authorities and the National Assembly Cabinet should consider how individual authorities under relevant legislation, e.g. Best Value, would be affected and whether there is the possibility of using existing legislation to place consortia on a statutory basis.</p>	<p>We agree with this approach. We are particularly interested in pursuing the opportunities offered by the Local Government Act 1991. We have previously registered this interest with DETR.</p>
<p>9: that the National Assembly Cabinet considers with local authorities how it should be represented on each consortium and agree the remit of its representatives.</p>	<p>We are happy with that suggestion. But we see NAFW as having primary responsibility in this respect, as NAFW membership on the Consortia affects the balance between the responsibilities of NAFW committees and the Executive. We explore this in more detail in the main text of our response.</p>

Recommendation	Response
<i>10: that the consortia raise their profile amongst passengers by developing their own "branding" linked to quality services.</i>	SWIFT and TIGER already allocate a proportion of their budgets to this. We are more than happy to explore how this exposure might be expanded.
<i>11: that the National Assembly and local authorities agree an evaluation framework for measuring the benefits of targeted public transport investment at national, regional and local levels, focused on delivering improvements and avoiding future mistakes.</i>	We strongly support this principle. We also return to the need for clear thinking on different kinds of investment as mentioned previously in our response to recommendation 5.
<i>12: that evaluation results of public transport policies, programmes and individual schemes across Wales be collected as a body of evidence of 'what works in Wales' over time, providing a base for future policy development.</i>	We are keen on this approach. There will remain the need to recognise that what works in Llanrumney may not work in Llanrwst.
<i>13: that passengers be involved in drawing up the evaluation framework, and involved early on in evaluating individual public transport schemes.</i>	Local authorities have extensive consultation frameworks that inform service delivery. Regional consultation frameworks might be expanded. Progress on this will also relate to recommendation 3.4 (All Wales passenger group.)
<i>14: that all those involved in planning and implementing public transport policy in Wales should learn about what does and doesn't work elsewhere, and consider how we can learn from this in developing more effective public transport services in Wales.</i>	We endorse this and see the Regional Consortia as being the conduits for disseminating experience. See also our reply to recommendations 3 and 11.

**APPENDIX 3 - PROPOSED MANAGEMENT MODEL**



**Key:**

**GROUPS OF PEOPLE**

*functions and activities*