

Dear

Proposed Changes to the 51/X51 Bus Route at Llandegla Denbighshire

On behalf of Llandegla Community Council (LCC), we would like to express our objections and severe reservations to the forthcoming changes to the Arriva 51 and X51 bus services which presently serve the community of Llandegla.

Following a well-attended Community Council meeting on January 4th where the issue was discussed as urgent business and many members of the public voiced their concerns, it is our considered view that the forthcoming changes have direct and indirect impacts on both residents of and visitors to Llandegla. In summary these impacts include, but are not necessarily limited to:

- (a) Increased risk of road-based accidents owing to unsatisfactory bus passenger infrastructure (e.g., no pedestrian crossing points, bus shelters, lack of pavements and street lighting);
- (b) Reduction in access to health services and reduced wellbeing to residents and visitors;
- (c) Reduction in access to educational provision including Coleg Cambria and Wrexham University;
- (d) Economic impacts, particularly for the village-based businesses and for residents reliant on bus services to access employment.

Furthermore, we are of the view that the rationale offered by Arriva is utterly inadequate. The alleged consultation was unsatisfactory for the purposes of informing a **publicly** funded **public** transport decision-making process; the suggested 20 mph argument is disingenuous given the majority of the route through Llandegla has been 20 mph for approximately 7-8 years and this appears to be the only material amendment to the route of this service; no good evidence has been provided for the economic argument (which might in any case be overridden by a public service argument); and existing issues relating to bus turning in the village are not material to this change.

Our detailed concerns and observations are articulated below:

1. Accessibility and safety concerns:

At the time of writing there are two stops within Llandegla village, at the top of the village hill by Trem y Grug, and at the bottom (heart) of the village (by the shop, carpark, church, and Memorial Hall). The proposed changes will mean that villagers that reside within the heart of the village will have to walk approximately 800 metres up a very steep graded hill with limited pavement provision and lighting to the A5104 trunk road. Equally there is very limited pavement provision and unlit sections along the A5104 and NO features that enable pedestrians to cross the A525.

The implications of the change are that individuals with mobility issues, e.g. wheelchair users, the old or infirm and parents with young children will be unable to access the bus at the proposed stop at the Crown Hotel.

As a Community Council we therefore consider the proposal materially **fails to consider accessibility issues**. We understand that the Welsh Government has published a policy statement concerning accessible and inclusive public transport. The Community Council are of the view that the proposed changes do not accord with and are contrary to this policy statement. It is the Community Council's understanding that measures that detract from this policy may have consequent financial implications in terms of exchequer subsidies on the service provider. We would welcome Denbighshire County Council's comment on this aspect.

We would like to ask whether a **risk assessment** has been completed and, if so, whether it considered previous accidents that have occurred at the junction of the A5104 and A525. We believe that a risk assessment would be unlikely to allow a formal bus stop in this location. The Crown Hotel is on a staggered crossroads with traffic lights on all four roads. We note for example that cars from Corwen turning right to Ruthin have very limited visibility and may not see any stationary vehicles present or persons crossing the road. There have been several accidents outside the Crown Hotel in the last few years, with one young girl being badly hurt when getting off the bus at the Crown. One of our community councillors walked the route with the Senedd Member Carolyn Thomas on 4th January 2024 just before the Community Council meeting and whilst outside the Crown they witnessed two cars speeding and overtaking just past the traffic lights. Since the speed cameras were installed on the A5104 there has also been an increase in the number of motorbikes speeding on this road.

We believe that there is inadequate infrastructure currently available for the purposes of enabling residents and visitors to safely access a potential bus stop at the Crown Hotel. There is no signage on the road to warn motorists that there are pedestrians walking on the road. There is no bus stop or shelter against adverse weather and no pelican crossing that would assist passengers crossing the A525 to access the bus service. There is no break in the sequence of lights to enable pedestrians to cross the road and there are blind spots which could cause accidents. There is no public footpath enabling pedestrians to avoid the traffic lights: the land opposite the Crown is privately owned with no right of way.

For all the reasons stated above, the Community Council is of the opinion that these changes could **significantly increase the risk of pedestrian road traffic accidents**. In the Community Council's view, the current bus stops within the village, which each have shelters, represent more appropriate locations for passengers accessing the bus services.

2. Access to services:

(a) Health

The Community Council is of the view that a re-routing of the bus service that effectively bypasses the village will have serious adverse direct or indirect impacts on residents' physical and mental health. Since the publication of the proposed change in the route of the bus, we have received reports highlighting concerns from residents about their continued ability to access essential health

and wellbeing care. Residents will no longer be able to use the bus to attend hospital and GP appointments. This implies a greater demand on health budgets for transporting residents to and from medical appointments. Consequently, the proposals are likely, directly or indirectly, to have serious financial implications for other public bodies such as the NHS. Furthermore, those residents who are unable to drive may experience social isolation and this could have consequences for residents' mental health.

The Community Council understands that Section 4 of the **Wellbeing and Future Generations (Wales) Act 2015** lists seven wellbeing goals. It is our view that the changes to the route of the bus route resulting in sections of the community being unable to access public transport would be contrary to the requirements of this ground-breaking legislation: the wellbeing goals deleteriously impacted by the proposals include (a) cohesive communities; (b) a more equal Wales; and (c) a resilient Wales. The proposals do not appear to accord with the promotion and delivery of long-term sustainability from community and economic perspectives. We therefore conclude that the loss of bus services within Llandegla does not accord with the requirements of this legislation. We have therefore copied this letter to the Future Generations Commissioner for Wales.

(b) Education

Students currently use the bus service to access academic institutions such as Coleg Cambria and Wrexham University. The bus service is the college's preferred mode of transport for its students, who should expect a safe and accessible means to transport them to and from college.

3. Economic activity:

For background and contextual purposes, Llandegla has one community-run shop located in the heart of the village. Volunteer staff are reliant on the bus service to be able to get to and from work. The Community Council has been informed that the proposed rerouting of the service is predicted to result in reduced number of customers (residents and visitors to the village) to the village's community shop. The loss of revenue has the potential to threaten the economic viability of this village shop. Further economic implications include the ability for residents without cars to access employment in Ruthin or Wrexham. These are often young people starting their careers, who are thus having their opportunities limited. The alternative would be for residents to travel by taxi. The cost of a taxi to either of these towns is approximately £25 each way, which in the current economic climate is unaffordable for most of our residents.

4. Demographic considerations:

Another factor is the changing age structure in the community. Census and other information identify changes to the demographic profile within the village and its environs: the average age is increasing and it is therefore predicted that there will be a greater demand for access to public transport services such as buses.

This change will be exacerbated if young people are unable to remain in the village due to the difficulties of accessing work.

5. Gritting programmes

Residents have queried with the Community Council whether the proposed changes to the route of the bus will have any implications on Denbighshire County Council's adverse weather gritting programmes. If yes, then this could have consequent implications on residents accessing employment or for DCC's educational staff being able to travel to Ysgol Dyffryn Ial.

Responses to the rationale offered by Arriva:

In addition to the above we would like to provide comments and observations on the points articulated by Arriva to justify the proposed rerouting of the 51/X51 bus service. In summary, we understand these to be:

- (a) the imposition of the 20 mph speed limit in urban/residential areas;
- (b) a public consultation exercise;
- (c) the economic justification; and
- (d) issues related to bus turning in the village.

(a) The 20 mph speed limit

We have been informed that that one of the reasons cited for the change in the route has been the introduction of the 20 mph speed limit within urban and rural settlements. For contextual purposes, the village has had a 20 mph limit from the top of the hill for approximately eight years. Consequently, the widespread changes to speed limits in September 2023 were effectively limited to a stretch of about 180m of the A5104. It currently appears that Llandegla has been the only village chosen to suffer as there are no other areas on the route that have been cut out entirely as Arriva propose to do with Llandegla.

Our understanding from the forthcoming timetable is that the proposed route only saves 7 minutes by staying on the A525 (although we have been informed the timetable lists a change of 3 minutes). A change to save between 3-7 minutes is, in our opinion, disproportionate when this effectively leaves a whole community isolated. We acknowledge that Arriva have suggested that the route of about 800m takes between 5-8 minutes, although we note that buses, when ahead of schedule, are known to wait at the stop opposite the school/Memorial Hall.

(b) A public consultation

The Community Council understands that a public consultation exercise was allegedly carried out by Arriva. The Community Council and the residents of Llandegla impacted by the forthcoming changes were not informed about this consultation exercise. Where was the consultation with the villagers? We therefore question the credibility of the outcome of this consultation. If the reason is the 20 mph limit, as indicated in the newspaper, why is Arriva not changing routes for

Ruthin, Llanfair DC, Bwlchgwyn, Coedpoeth and even areas of Wrexham? We would like to see the impact assessment carried out for people who are disabled or reliant on the bus service. Does this meet the legal legislation and requirements? To our knowledge, no one from Arriva has visited the village.

(c) Bus service economic argument

We note that Arriva have submitted an economic argument to justify the amendment to the bus route. However, to date we have not seen any detailed figures to evidence this argument. Given that rural services are subject to Welsh Government subsidies we are highly sceptical of an economic argument for deleting between 3-5 minutes of journey time for the service. We have also been informed that passengers who use bus passes when using the bus cannot be identified as specifically travelling between Llandegla and their chosen destination. We would imagine that a substantive number of our residents, i.e. those over sixty years of age and students, will use passes and therefore cannot be included in the statistics cited by Arriva of the number of passengers travelling to and from Llandegla.

Furthermore, in our opinion, when public subsidies that underpin the service are considered, we are of the view that alleged economic argument are in this case overridden by public service requirements.

(d) Bus turning issues

We understand that one of the issues raised by both Arriva and its drivers is the requirement for buses to turn around at the junction of Ffynnon Tegla and the village road. We understand the issue is with the potential for parked cars to obstruct the bus whilst turning. The Community Council acknowledges the potential issue and requests Denbighshire County Council as the relevant highways authority to impose a no parking zone at this junction and/or paint the road with markings that delineate a bus turning zone (a request that has been made in the past). Current signage is not considered by the Community Council to be satisfactory. However, this component issue is in our view not material in terms of justifying the current rerouting of the bus service.

Finally, you will be aware that Denbighshire County Council declared a Climate Change and Ecological Emergency in July 2019 . Subsequently a strategy for 2021-2030 was published, updated in 2023. It is the Community Council's view that a vital underpinning measure to combat climate change will be the increase in access to public transport. We believe that Arriva's proposal will cause a net increase in private transport including the use of ambulance and other services: therefore acceptance of the forthcoming re-routing of the bus service by Denbighshire County Council would be contrary to the aims and objectives of the above strategy.

We trust that on receipt of this letter that you will now instigate a detailed review of the forthcoming changes of the 51/X51 bus service through Llandegla. We look forward to receipt of further proposals that effectively reinstate the service to the heart of the village.

Yours sincerely etc.

cc. to

David Jones	MP
Derek Walker	Future Generations Commissioner for Wales
Darren Millar	MS
Mark Isherwood	MS
Carolyn Thomas	MS
Llyr Gruffydd	MS
Terry Mendies	DCC
	Traffic Commissioner for Wales
	Arriva