

Cardiff Bus Response to the National Assembly for Wales Policy review of Public transport

Further to the letter dated 20th July received from Richard Edwards, I enclose the comments of Cardiff Bus to the policy review of public transport document circulated with Richard Edwards letter.

Could I just say that Cardiff Bus welcomes the opportunity to comment on this timely review of public transport. We would hope that the opportunity is given to all Public Transport Operators to further debate the key issues following receipt of interested parties comments.

Chapter 1 - Introduction

Whilst the policy review has concentrated on bus, rail and community transport it needs to be closely linked to investment criteria and decisions taken in regards to other areas of transportation, particularly road based transport. In this regard, there is a need to ensure that common appraisal techniques and overall monitoring are in place to ensure the optimisation of transportation resources.

Chapter 2 – Public Transport today

It would have been helpful in the section entitled “current picture” to see how Local and Central Government Investment have been targeted between the facilitation of the car, bus and rail operations. The historic concentration of investment into facilitating the un-restricted use of the car and the starving of investments for large sections of the public transport has lead inevitably to the levels of modal split and journeys per person indicated in the report.

In paragraphs 2.7 to 2.11, the report indicates that buses remain the most popular form of public transport. The report also highlights the fact that Welsh Bus Operators are the most efficient in the United Kingdom with the lowest costs of operation. The relatively high cost per passenger journey compared to the average in Great Britain emphasises the problems of bus operations in Wales and the fact that many services, whilst operating “commercial” are highly marginal. In terms of the current situation, bus operations have suffered during Local Government Authority change from 8 Counties to 22 Unitary Authorities.

As a result of different support policies, a number of bus services were withdrawn. Currently many authorities have different support policies and criteria for supporting socially necessary but loss making services.

While these problems are now beginning to reduce with the introduction of regional consortium of local authorities greater co-ordination and co-operation is urgently needed.

Recent difficulties for Bus Operators have included the pursuit by Central and Local Government of investments in road and rail transport with little or no evaluation of the likely effect on bus services. The lack of an integrated evaluation framework and failure to use common appraisal investment techniques

has led to (and indeed is still leading to) investments, which damage road based public transport. The current proposal for the Vale of Glamorgan railway line passenger service re-instatement is a case in point. 59% of the traffic on this re-instated railway line will be directly taken from bus services.

In paragraph 2.17, the achievement of Assembly's target will only be attained by Central and local Government working together with operators and the implementation of Regional and National policies, which follow integrated principles including common appraisal investment techniques.

In paragraphs 2.20 to point 2.22 entitled "Role of Local Authorities" it is noted that 4% of Local Authority net expenditure on local roads and transport goes to subsidising car parks. This equates to 50% of the expenditure on public transport, which in itself is less than 10% of the expenditure on roads lighting and road safety. The inclusion of concessionary fares as a transport expenditure item is disputed. The 1985 Transport Act requires Local Authorities to ensure bus operators are no worse and no better off as a result of any concessionary fare scheme. The expenditure on concessionary fares for old age pensioners is therefore a social cost and not a transport cost and should be excluded from these figures as it has a neutral effect on the transport budget.

Chapter 3 – Vision and Quality

Paragraph 3.1. The proposal to improve the quality of public transport is supported, as is the proposal for a Welsh Transport "Kite Mark". Such a kite mark should be allied to the implementation of statutory quality partnerships by bus companies and Local Authorities. At the same time the kite mark will need to be aligned very closely with existing staff training and qualifications already under taken by the bus industry. In this regard, National Vacation Qualifications of the WTB Welcome Host programme will need to be incorporated into the staff element of the proposed kite mark.

In terms of making services more attractive by improving frequency the existing mechanism of the 1985 Transport Act makes this difficult where commercial services are involved. In order to make this more readily achievable an urgent review of the De-Minimus provisions currently set as the UK standard need revising upwards. This will allow Local Authorities greater scope for local negotiation with their commercial Bus Operators.

Modern vehicles "Enabling people with disabilities to travel with ease" will only produce the desired result as part of a package of parking and investment controls with the Local Authorities involved. There remains a major problem in Wales with the lack of parking enforcement and control in many Towns and City Centres. A key issue that can destroy the good work of both Operator and Local Authority is the lack of effective parking enforcement by local police forces. The Welsh Assembly will need to encourage Local Authorities to implement the de-criminalisation of parking enforcement as a key element in improving accessibility to road based public transport for encumbered and disabled passengers.

The proposal to develop long distance coach services to compliment rail services is welcomed. There are many potential routes where rail links can either compliment or effectively extended by "coach rail" links including the following: -

- Carmarthen – Aberystwyth
- Pwllheli, Caernarfon and Bangor
- Swansea

- Heads of the Valleys – Newport.

One key area overlooked in terms of improving accessibility and quality of transport is the security of passengers particularly at bus stops, bus stations and railway stations. The majority of public transport passengers on buses are women (approximately 70%) who feel particularly vulnerable outside the vehicle when waiting or leaving the vehicle at night. Particular attention and improved guidelines and lighting provisions need to be incorporated into all elements of public transport. In particular, the maintenance of roadside infrastructure for public transport needs to become an integral part of Local Authorities maintenance of highway infrastructure. Bus shelters generally are not maintained as part of the infrastructure and in many areas have been allowed to deteriorate and decay.

In paragraph 3.4, elements of quality, require a planned joined approach as part of your quality partnership include journey times and frequency. The big problem facing both Bus Operators and Local Authorities is the reluctance of Local Authorities to effectively manage and monitor their highway space. Besides the need to consider the decriminalisation of parking enforcement, in the more congested areas of Wales, serious consideration needs to be given to work place charging and in one or two locations congestions charging. There is clearly a need for regional approach to such issues following clear guidelines laid down nationally by the Welsh Assembly. The improvements in journey time and quality, plus service enhancements and new services such as Park and Ride, can be funded by the implementation of work place and congestion changing policies and will need to follow a firm national lead given by the Assembly.

It is noted that in paragraph 3.8 the Committee were impressed with the quality partnership approach being taken by Greater Manchester PTE. One area that the Assembly will need to consider is how to bring reluctant Local Authorities into quality partnerships. Wales is lagging significantly behind both England and Scotland in the implementation of partnerships due to reluctance, not on the part of Bus Operators, but Local Authorities.

In paragraph 3.13 “Affordability”, the provision of Concessionary Fare Scheme is a social policy, which clearly has an effect on the transport industry but by law, the financial effect is neutral. As such, care needs to be extended when committing large sums of revenue to such schemes, as whilst there is a considerable improvement in social mobility, there is no beneficial financial effect on the transport network, (although modal split may be moved towards public transport by such policies). Such schemes are therefore clearly a subsidy to the passenger and not to the public transport industry.

Paragraph 3.14 investment. The recognition of the historical under investment in public transport is welcomed. Regrettably however it continues and urgent action needs to be taken to re-address the balance particularly in regards to key interchange points and other facilities. Many Welsh bus stations are a disgrace and a security hazard at night.

Key Projects

One area not developed in paragraph 3.15” Key projects” is that of improving school transport and achieving reduced congestion by staggering the opening of school hours and improving the quality of vehicles can be achieved with staggering of school opening hours and “double tripping” school vehicles. Higher quality vehicles at similar unit costs to the present day.

Paragraph 3.18. The recommendation that Local Authorities prepare regional public transport strategies by 2003 is supported.

Chapter 4 – Existing Organisational Structures

In Paragraph 4.5 there is little evidence to suggest that Local Authorities in Wales are prepared to use effectively their powers on traffic and highway and parking management. Given the lack of evidence it is suggested that encouragement from the National Assembly would be required and therefore recommendation 6 of the committee is supported.

In terms of Voluntary Regional Consortia, this is seen as a pragmatic approach, avoiding the need to introduce primary legislation, and is supported. It is imperative however, that in Regional Consortia the National Assembly is represented. It is also clear that the consortia would need officers employed full time whether directly or in a seconded role.

In paragraph 4.12 the suggestion that the Consortia raise their profile amongst passengers by “branding” is supported where appropriate. In the greater Cardiff area the branding of limited bus stop services operating to and from the Cardiff central area is one example where this could occur rapidly.

Chapter 5 – Alternative Organisational Structures

The PTA/PTE structure in England and Scotland has never worked effectively because of the lack of any highway responsibilities or controls. A fully integrated approach is needed and therefore the PTA/PTE model is seen as impractical. The fact that primary legislation will be required also means that the timescale for such a solution is wholly inappropriate given the current pressure and level of problems in many areas of Wales.

As mentioned in paragraph 5.17 “the lack of any Welsh input into the SRA” is an area requiring an urgent re-address.

Chapter 6 – Monitoring and Evaluation

Without effective measuring and monitoring, it is impossible to manage the transport scenario in any area of Wales.

The Assembly will therefore wish to see put into place effective measuring and monitoring of all modes of transport on a national basis. This should apply not just to bus and rail service but also roads so that a full modal split picture, accompanied by journey times and other key indicators can be derived on a regular basis for each urban area of Wales.

Similarly, common evaluation techniques measuring the benefits of alternative solutions to a perceived transport of problem need developing to avoid misallocation of resources. An area where this is urgently required is the project to re-introduce passenger services on the Vale of Glamorgan Railway Line. No overall transportation appraisal of evaluation has taken place and previous mistakes in misallocation of scarce transport resources are likely to be repeated.

Summary of Cardiff Bus Comments

1. Cardiff Bus supports the broad thrust of the recommendations contained in the policy review of public transport document.
2. The existing regional Consortia need to be developed to provide an integrated approach to public transport. The development of the existing regional Consortium will require the involvement of the National Assembly for Wales and also full time staff for the Consortium. In addition, the Consortium will acquire to have an input and powers to oversee policy and implementation of key highway issues such as parking controls, traffic management, bus priorities, de-criminalisation and ultimately work place and congestion charging. In the longer term, it would seem logical to extend this approach to cover all transportation investment and development and not just public transport.
3. The suggestion for a PTA for Wales or a PTA/PTE for South East Wales is felt to be wholly inappropriate. These bodies have proved bureaucratic, expensive and not effective in England and Scotland. The main reason being such organisations have no responsibility for highway investment and controls.

The fact that the establishment of a PTA/PTE structure in Wales would require primary legislation also means that this is not a suitable policy option given the very heavy short term pressures in many areas of Wales requiring a mechanism to provide a method of dealing with problems on a timely basis.

4. The view that rail services should follow the Scottish model in terms of delegating responsibility for local rail services is accepted as purely logical.
5. Major changes need to be made in the way bus quality partnerships and other public transport improvements take place under existing legislation. In addition, De-Minimus requirements need urgently reviewing in Wales to enable Local Authorities to easily develop policies to improve frequency and quality of commercial bus services.
6. The National Assembly for Wales will need to ensure that proper monitoring and investment appraisal criteria are put in place. The latter need to be based on common appraisal investment techniques and used in all major investment appraisals.