

## **West of England Combined Authority:**

### **JLTP4 - CONSULTATION QUESTIONS ON BUS STRATEGY**

#### **Response by the Federation of Bath Residents' Associations**

The Federation of Bath Residents' Associations is the umbrella organisation of 32 residents' associations in Bath, which between them represent some 5000 residents of the city.

**3. How often do you travel by bus in the West of England?** Not applicable, as this is a group response.

**4. How far do you agree with our objectives?** Strongly agree. We welcome this Strategy, which supports the JLTP4 with a vision, explicit objectives and strategic themes for bus services in the region. There is an urgent need to provide good alternatives to private car use to enable modal shift and reduce traffic volumes especially in the urban areas. We welcome the recognition (at page 14) that parking control and traffic management should also be employed to drive modal shift.

**5. Do you think our target to double passenger numbers is sufficiently ambitious?** The ambition of doubling numbers is welcome, but we would like to see a more ambitious target. Bus user numbers in many parts of the region are extremely low. Whereas doubling of bus passenger numbers within well-served areas may be reasonable, there should be an aim for a far greater shift to bus transport in the areas currently less well-served. The target date of 2036 is not a sufficiently ambitious. We suggest 2030.

**6. Would you be prepared to walk further to a better, more reliable bus service?** Yes.

**7. How far do you agree with the concept of an interchange-based network?** We agree strongly with the concept of an interchange-based network, which is essential to make the switching from one route to another quicker and easier – distance between route bus stops, bus stop facilities and waiting times are all potential obstacles that will deter many drivers to even consider switching to buses. The current network is the sum of the individual routes that have accumulated over time based on commercial viability for the bus operators (with some routes subsidised by Councils). A bus network designed to achieve the Bus Strategy objective of achieving modal shift away from cars would probably look different from the current network. At the heart of the Bus Strategy should be a fresh design of an integrated network that provides bus services that compete successfully with car journeys now and in future. The new network would incorporate the principles set out in the Consultation Document: track the most heavily used car corridors, provide both cross-city and orbital services, facilitate coordinated interchanges at multiple hubs such as Park & Ride sites, offer good frequencies and provide ad hoc on-demand mobility in low-density areas.

**8. Do you agree that rural communities could be better served by connections to transfer hubs?** Strongly agree. The prevalence of poorly served rural areas around Bath requires particular attention to the design of enhanced services for these areas, with multiple hubs providing efficient connection to services to both Bath and other rural towns.

**9. Do you think that we should explore other transport solutions to serve rural communities rather than conventional bus services?** Yes. There may be too much emphasis in the current document on community buses, which often travel (rather

expensively) with only one or two passengers. Web-based arrangements for sharing cars and arranging private hire journeys will often be more cost-effective; WECA should give consideration to any issues of safeguarding or insurance cover which arrangements may raise.

**10. How far do you agree with the re-allocation of road space in favour of buses to ensure bus services run punctually?** Strongly agree. WECA should aim to guarantee absolute bus priority on all relevant corridors. Bus priority addresses one of the most significant current constraints on making buses competitive with cars. Reallocation of kerbside space from parking to bus (and cycle) lanes will be a necessary to give buses top priority. This implies the need to reduce other traffic.

**11. How far do you agree with diverting traffic away from certain public transport corridors?** Strongly agree.

**12. Do you agree with buses having extra 'green time' at traffic signal to help services run punctually?** Strongly agree. Comfortable and attractive stops and shelters also play a significant role in drawing passengers away from cars. The current rules on timetabling laid down by Traffic Commissioners should be reviewed, as they are a significant factor in giving the impression that buses are for people not in a hurry, which deters car drivers from using them.

**13. How far do you agree with our ticketing principles?** Strongly agree.

**14. Are there any other improvements to the provision of bus information that would you like to see?** Buses cannot compete with cars without a sophisticated passenger information system. The principles underlying the proposed Bus Information Strategy are excellent. Technology enables such an information system to be delivered. An app-based 'transport as a service' platform incorporating all modes (e.g. Citymapper) would boost bus competitiveness with car travel with instant all-mode comparisons of cost, travel time and frequency. However, the needs of those, often including older people, who are unable to use such services also need to be adequately catered for.

**15. How important are modern vehicles to your passenger experience?** Extremely important. In future, WECA will be in a position to specify equipment under any of the operating models it selects. The size of buses for each route should be optimised. Oversized equipment adds to cost and congestion while undersized buses can create overcrowding, passenger dissatisfaction and the cost of higher frequencies to meet demand.

**16. Would you be open to using a shared taxi/mini bus to connect to the wider bus network?** Yes. These could also connect to train services into Bath, Bristol and other centres, which run reasonably late into the evening and early morning.

**17. How do you think councils should spend their budget for supported bus services?** In order of priority:

- Park and ride services
- Rural services
- Services to hospitals
- School buses
- Access to employment.

### **18. Which of the Bus Strategy's themes would you prioritise?**

- A well-designed network that is simple, coherent and efficient across the region
- Giving passengers more reliable and faster buses through priority infrastructure and wider policy
- Modern, clean and accessible buses that contribute to reducing transport's harmful emissions
- A safe, pleasant and comfortable customer experience
- Simple, smart and convenient ticketing
- High quality, consistent and easily understood information

### **19. Do you have additional comments on the Bus Strategy? Yes:**

1. The choice of operating model lies at the core of the Bus Strategy and profoundly affects WECA's ability to implement it successfully. WECA has statutory powers that allow it to choose from several bus operating models, ranging from the existing deregulated private operator model to a fully franchised 'London' model. Several operator partnership models lie between the two extremes. The Consultation Document considers these alternatives but appears to dismiss the franchise model as bringing higher costs. It is not possible to select the best operating model (i.e. the one most likely to meet the objectives at lowest cost) without a rigorous assessment that takes into account not only the allocation of commercial risk and reward between WECA and bus operators but also the essential elements of the bus system that must be centrally controlled if it is to meet its objectives, including network design, infrastructure, pricing/fares, equipment, information and payment.

2. Franchising would give WECA control over all of these elements to ensure that the bus system is run wholly in the public interest. With franchising comes revenue risk and the administrative cost of operator contracting. Partnership models could enable central control over all the essential elements except for network design and pricing/fares/ticketing conditions. It is conceivable, however, that WECA could develop a partner operating subsidy scheme that provided for competitive tenders for packages of routes from a WECA-designed network and fares structure. Untendered route packages in the network could be franchised. Understandably, bus operators generally oppose franchising, which they feel could encourage competition and reduce profitability. The operating subsidy required to meet the Bus Strategy objectives would likely be the same under both operating models. With franchising the subsidy is the WECA operating deficit; with partnerships the subsidy is paid to the bus operators.

3. The most challenging reality of public transport is that it inherently requires operating subsidies to allow fare levels that are competitive with cars. However, intelligent pricing and fare strategies can be a powerful way to minimise the public subsidy needed for an effective bus system. Other transport sectors, notably airlines, have demonstrated that fare strategies exploiting the inherent 'elasticity' of demand (i.e. the impact on passenger volume caused by each incremental change in price) can significantly increase revenues. The same basic principle of demand elasticity inherently applies to bus fares. Fixed bus fares are not optimal. Lower fares will increase off-peak passenger volumes, potentially enough to compensate. Peak demand fare increases will reduce passenger volumes but possibly not very much. A better understanding of bus fare elasticity is needed. Perhaps WECA could join with other combined authorities to sponsor research on this question. The simple criterion for bus fare levels at any time should be always to keep the buses full. The operating subsidy level required for low fares and full buses may not be significantly higher than for higher fares and

near-empty buses. Apart from a well-designed network lower fares are the most powerful way to make buses competitive with car travel.

4. Funding needs to be considered in more depth. WECA's funding powers may be able to deal with bus infrastructure capital expenditure needs but it cannot easily provide the operating subsidy that is essential to achieve the objectives of the Bus Strategy. Indeed, there is a question of whether a large expenditure on bus infrastructure is actually warranted unless fare levels can be low enough to move a significant number car drivers to buses. Central Government will not be a source of significant bus operating subsidy other than for the existing concessionary fares scheme and for the Bus Services Operators Grant. WECA and the WoE Unitary Authorities should prioritise the development of new funding sources for operational support of the new bus system. These could include:

- Road User Charging (RUC): already contemplated in the JLTP4 and in the Consultation Document, RUC can be a powerful revenue generator for the bus operating subsidy. It follows naturally from the already developed CAZs in Bristol and Bath, could eventually subsume them, and would also provide added incentive for drivers to switch to buses. A detailed plan for a new RUC for London to replace the Congestion Charge and the ULEZ Charge has already been developed and may be proposed in some of the London May 2020 mayoral election manifestos. This RUC proposal was designed for use also by the other mayoral combined authorities, including WECA.
- Parking Charges: There is significant scope for the WoE Unitary Authorities to increase parking revenues with new parking strategies designed to reduce the intrusion of cars in the urban centres. Central to these plans would be to create effective pricing differentials between Park & Rides and parking in centres.
- Workplace parking levies, also mentioned in the JLTP4 and the Consultation Document, should be included in these new parking plans.

It is heartening to note that the JLTP4 consultation showed public support for congestion charging and a workplace parking levy to raise funds for transport improvements.

5. Insufficient attention is given in the consultation document to operating hours. In order to achieve modal shift it is important that operating hours are extended on the main routes within the main urban centres and especially on connecting routes between Bath-Bristol and from both main urban centres to Bristol Airport. It would be particularly important to extend operating hours and increase frequency in the evenings sufficiently to reduce the barrier to use of bus services for attending evening events in urban areas; for example the park and ride service in Bath finishes too early to be useful for people visiting the city for the evening.

6. The draft Strategy does not mention travel planning by institutions across the West of England. Paragraph 111 of the National Planning Policy Framework sets out that all developments which generate significant amounts of transport movement should be required to provide a Travel Plan, while the Department of Education's Home to school travel and transport guidance Statutory guidance for local authorities (July 2014) advises "Effective school travel plans, updated as necessary, put forward a package of measures to improve safety and reduce car use, backed by a partnership involving the school, education, health and transport officers from the local authority, and the police. These seek to secure benefits for both the school and the children by improving their health through active travel and reducing congestion caused by school runs, which in turn helps improve local air quality." (§4). Such travel plans will normally include efforts to encourage the use of public transport, in particular buses, and WECA and its constituent authorities should both be supporting, and

also maintaining pressure on, employers and on schools to keep travel plans up to date, ensure they are fully implemented, and see that they place a sufficient emphasis on bus use.

7. We are glad to see the mention of accessibility to and from bus-stops in terms of improving the direct walking routes (page 19). This leads in to a wider issue, namely that walking routes are not properly addressed in local plans. Improvements to walking routes tend to be seen in terms of minor works projects, either to resolve problems with existing routes or to set out a new route in existing open space. There is however a need to identify desire lines for new routes even in circumstances where these cannot currently be implemented because of existing developments, with a view to addressing the matter at some future time in the event that the site in question should come forward for redevelopment. This opportunity was highlighted by the JLAF a few years back but has not yet been picked up, and as local plans are renewed it should be.

8. The third paragraph on page 17 repeats text in the second paragraph.

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