

# TravelWatch NORTHWEST

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***Winner of CILT award for best practice in passenger transport (2013)***

***promoting quality public transport.....***

Fran McMahon,  
 Department for Transport,  
 Bus Services Bill Zone 2/15,  
 Great Minster House,  
 33 Horseferry Road,  
 London SW1P 4DR

16<sup>th</sup> March 2017

Dear Fran,

## **Bus Services Bill: Consultation on Draft Regulations and Guidance**

### **1. Introduction**

1.1 TravelWatch NorthWest is an independent Community Interest Company representing all public transport users in North West England. We are pleased to give our views. We have received a comprehensive submission form FOSCL and will use their comments (in italics) to illustrate the issues. The chief areas receiving our attention are Annex M Guidance for improving bus services and Annex P.

### **2. Bus patronage**

2.2 There is a clear need to reverse the downward trend in bus patronage in our region. While recent trends show increases in London and in England overall, bus use since deregulation has gone down by 44% in Metropolitan areas outside London and increased by 105% in London which is not deregulated. Bus journeys per annum per inhabitant in London are 280 compared to 65 in the North West. The trend in our region has seen a drop of 11% from 2004/05 to 2013/14. Rural areas have been badly hit by wholesale service withdrawals.

### **3. Guidance for improving bus services**

#### ***3.1 Rural bus services the challenges***

3.1.1 We had concluded that the emphasis in the Bill appeared to be on urban areas and while many of the changes proposed are to be welcomed, there was scant mention of how to reverse the catastrophic decline in service levels and patronage due to local authority cuts and failure to recompense operators for concessionary fares, particularly in rural and semi-rural areas. Local

Transport Authority (LTA) lack of support for rural and less used services has led to loneliness and isolation for so many who now have a free bus pass but no service to use it on.

*3.1.2. For example over recent years funding cuts by Cumbria County Council and North Yorkshire County Council have drastically reduced bus services in rural areas even to substantial settlements. There are now no regular buses from Appleby to Penrith or from Kirkby Stephen Station to its town 1.5 hilly miles away, Brough, Appleby, Penrith, Sedbergh or Kendal. Services have been entirely withdrawn between Settle and Clitheroe and between Skipton and Harrogate whilst buses from Skipton to Malham and Grassington are much reduced.*

*3.1.3. Despite over 1000 passenger trips per week, including essential journeys to work, health facilities and preferred schools, the Monday to Saturday bus service between Kirkby Stephen, Brough, Appleby, Kirkby Thore and Penrith was withdrawn in December 2016 as the operator lost interest in the face of DDA requirements and losses incurred by the Winter 2015-16 floods in Appleby. Other operators have declined to fill the gap except for a Tuesday only "Heritage Service" operated by an inaccessible vehicle. The current operator of weekday bus services in Wharfedale has indicated their intention to quit local bus operations next year.*

### **3.2 Rural proofing**

3.2.1 A major concern with the Bus Services Bill is that it requires individual Local Authorities to take a pro-active stance to promote and improve local bus services. Over the years LTA's including Cumbria and North Yorkshire have dismantled their responsibilities for supporting local bus services especially in rural areas. Therefore we would urge the Government to **require** - not just recommend – that all LTA's undertake a Rural Proofing exercise and act upon it.

### **3.3 How the Bus Services Bill can be used to improve local bus services**

#### ***Franchising and partnerships***

3.3.1 We welcome Franchised and Enhanced partnership Schemes if they improve the provision of rural bus services.

3.3.2 We completely advocate the statements in paragraphs 14 & 15 of Annex M. A design of franchising that enables the balancing out of the provision of services to benefit rural areas is welcome but to be equitable would need to restore many links which have been withdrawn. *For example FOSCL is aware of mindless duplication of bus services on the fringe of the Yorkshire Dales (eg Ilkley to Harrogate; Harrogate to Knaresborough and Wetherby) whilst other small towns, large villages and major tourist attractions like Kirkby Stephen, Appleby, Brough, Slaidburn, Kirkby Thore, Malham, Bolton Abbey, Fountains Abbey and Sedbergh have inadequate bus services.*

### ***Other options that can be used to improve rural bus services***

3.3.3 We have reservations about Community Transport as a viable alternative to timetabled bus services. As an alternative to local buses, community transport is limited. It is difficult for Community Transport or Demand Responsive Transport to replace bus services as such services are not accessible for all visitors, tourists and others, to the area. A widely advertised scheduled bus service provides a means of transport which anyone can choose to use.

3.3.4 *FOSCL advise that Some Community Transport Minibus Schemes have filled gaps created by bus service cuts and these provide useful links from Dent and Garsdale Stations to nearby villages using a mix of volunteer and paid drivers whilst Wensleydale also has a good Demand Responsive Service open to all. However we agree that this contrasts with many DRT schemes which are only available to local residents and / or mobility impaired persons.*

3.3.5 Referring to paragraphs 23 and 24 it is **essential** that community transport services are integrated into the network of commercial and supported services. It is also essential that they are open to all users and that their existence is well publicised nationally as well as locally to ensure maximum awareness. This is especially important as visitors from other areas e.g. the towns and cities - to attractions; walking etc - are an important rural economic benefit.

3.3.6 Total transport is something that we have long advocated. The cross sector benefits which accrue contribute to the viability of rural public transport.

## **4. Service standards (page 129)**

4.1 We advocate the following standards -

### ***At the bus stop, bus station.***

- Accurate, up to date timetable and other information should be displayed in cases at bus stops. Many bus stops, particularly rural, have no information of bus times displayed at all. The operator of all services should be shown, as some passengers may have operator specific tickets.
- There should be real time information at bus stops and bus stations, especially at major stops - ideally at all bus stops. This must be "real-time", not timetable times. With GPS now widespread digital real time displays should be mandatory at all locations.

### ***On the bus***

- Visual and audible information covering stopping patterns and next stop should be fitted to all new vehicles as standard as per the London

model. In the meantime consideration should be given to audible location announcements during journeys.

- Clear instructions should be displayed for the use of passes on boarding the bus.

4.2 In general the decline in the provision of timetables and information to plan journeys and cater for tourists and visitors should be reversed. In many areas of the NorthWest it is the Local Transport Authority duties that have failed not the commercial services provided by operators.

4.3 Local timetables can be difficult to procure. For example, a passenger asked for a Knott End timetable at Lancaster bus station enquiry office recently but was told this was no longer available as the service was no longer run by Stagecoach. This was also true of long distance express services although all of these arrive and depart from the bus station. Where an enquiry office exists (and many have been closed) bus companies should be obliged to stock information of all buses using that station. The same is true of departure boards which frequently seem to omit some services .

4.4 Better information about fares is necessary. In 2014 we carried out an exercise (following a similar one in 2009) to demonstrate the ease of finding out the cost of bus fares before travelling. In 2009 the conclusion was that bus fare information can only be obtained by actually making the journey or telephoning the operator or operators concerned. Web based journey planners such as Traveline or Transport Direct (no longer in operation) were of no help.

4.5 The 2014 report found that since the 2009 report no progress had been made on making bus fares information more widely available since the original exercise was carried out. Indeed in some respects the situation had worsened. Traveline and Transport Direct (now closed) were unchanged in respect of lack of fares information, most bus company websites did not give ordinary single or return fares and it was lamentable that many bus station enquiry offices had closed.

4.6. The report is available on our website - [www.travelwatch-northwest.org.uk/Studies.htm](http://www.travelwatch-northwest.org.uk/Studies.htm)

## **5. Ticketing and integration with rail (see page 132 of the consultation)**

5.1 In general we look to affordable fares with well marketed ticket offers. Often ticketing for single short bus journeys is dearer than train travel. Many people have day/area or other passes which are good value for multiple journeys but for others the price discourages bus travel. Single-operator ticketing means that a return or multi journey ticket is not always available on all services on the route - we have noted passengers being refused travel due to having other operators' tickets. This is not normally the case with rail.

5.2 In many cases it is cheaper to purchase a Day ticket for return journeys. However the large operators tend to promote their own day, weekly and monthly tickets quite heavily and do not mention the multi-operator ticket unless prompted. Even where there is an all-operator ticket, it is always undercut by the operator's own (often very good value) ticket from which the operator receives 100% of the revenue.

5.3. The move towards new technologies (e.g. smart cards and contactless payment) will help to alleviate slow boarding times caused by passengers finding correct change. We welcome the commitment in the Bill to ensure that LTAs continue to make multi operator ticketing schemes. This should apply to simple single and return tickets as well as multi journey tickets.

5.4 We welcome welcomes any initiative to improve or indeed just retain bus services connecting with trains. Buses can extend the reach of the train service to a much greater population as well as providing more destinations for visitors *eg passengers alighting at Dent Station on Saturdays can not only reach Dent Village 4 miles away but also have access to Sedbergh and Kendal.*

5.5 However integrated bus-rail **ticketing** is difficult to implement in practice especially as it often results in reduced (and delayed) revenue for the bus operator together with the installation of relatively expensive ticketing equipment. A much simpler scheme in rural areas would be automatic discount fares for bus passengers presenting a valid train ticket and train passengers presenting a valid bus ticket. This would need to be centrally funded and promoted, probably through the Rail Delivery Group. *The FoSCL funded Northern Dalesman bus (as featured on BBC4) already offers reduced fares for passengers transferring off the train at Ribbleshead Station. The Dales Rambler ticket covers rail travel from West Yorkshire to Skipton and Bradford together with some buses in Wharfedale and to Malham but cannot be purchased on-bus for reverse direction travel into Leeds and Bradford to the annoyance of local residents. It is also subsidised by the bus operators of some commercial services in the scheme as the extra passengers generated do not cover the discount effectively offered; 66% of the revenue generated goes to the TOC.*

## **6. Concessionary Fares & Other issues not covered**

6.1 There is scarce mention of this issue in the Bill except for a brief reference under the Enhanced Partnership Scheme, yet perhaps the most profound problem facing bus operation currently is the concessionary fare and lack of full re-imbusement to operators. Having a free pass but no buses to use it on has ceased to be a prediction in many areas. Indeed there appear to be huge differences in reimbursement levels between authorities, often because they are tailoring payments to fit a budget rather than ensuring operators are "no better and no worse off". In rural areas and small towns this is perhaps the greatest issue facing operators as pass holders can make up 80% or more of total passengers.

6.2 We always advocate passengers' rights and input to the services that they use. There is a need for passenger involvement in the creation of all partnership and franchising agreements. We also strongly feel that there is a requirement for passengers' views on routing, frequency and fares levels to be actively sought when changes are made.

6.3 In addition complaints procedures are currently not well publicised. We would like to see a notice prominently displayed in all vehicles used on Registered Local Services explaining how and to whom comments and complaints can be made and giving contact details of the appeals procedure. The Bus Appeal Body's current remit with regard to complaint handling is very limited. ***It is not a statutory body.*** We understand that its terms of reference only permit it to deal with complaints from bus users regarding specific incidents or operational matters such as running to time, charging the correct fare and the behaviour of staff towards passengers. It cannot deal with commercial or operational matters such as the level of fares, the level of service provided, or the routes taken by buses.

Thank you for the opportunity to respond

Yours sincerely,

*John A Moorhouse*

John Moorhouse, Company Secretary