

## Welsh Government Consultation: Improving Public Transport

### 1 Introduction

- 1.1 Transport Focus is the independent consumer watchdog promoting the interests of rail passengers throughout Great Britain; bus, coach and tram passengers across England, outside London; and users of the Strategic Road Network in England. We have a Board Member for Wales appointed by the Minister for Economy and Transport.
- 1.2 We welcome the opportunity to respond to the Welsh Government's consultation, with evidence from our passenger research.

### 2 Establishing Joint Transport Authorities

- 2.1 Since winding up the four Welsh transport consortia in 2014, local transport has been organised individually by 22 local authorities. However, people do not travel in silos, so it is essential for transport to be organised on a wider basis that crosses authority boundaries, with mechanisms in place to ensure effective liaison and decision making processes for cross-boundary and cross-border services, for passengers' local needs to be served.
- 2.2 The industry – bus operators, local authorities and Government – needs to work together, with a relentless focus on getting the essentials right, alongside a more effective and targeted approach to customer retention. This will help build trust and loyalty to make using the bus a real long-term proposition. More operators and authorities must also work together to attract new passengers and ensure bus continues to provide an essential lifeline to communities.
- 2.3 Our research<sup>1</sup> shows that building trust is made more difficult by it not being clear to passengers who runs which parts of the bus network, why bus routes run where they do, and at what time services choose to run. This has far-reaching implications:
- passengers don't know who to complain to if there are systemic failings in a bus service, which they find disempowering
  - passengers make assumptions on how buses are set up, believing it to be run by a combination of an 'over-regulated' public sector with a 'profit imperative' private sector – arguably the worst possible stereotypes
  - one outcome of this knowledge gap is that passengers don't know who they should be 'being valued by' if even they were to be valued. Any value felt is more ascribed to drivers acting as individuals rather than from the bus company itself. Whilst passengers don't want 'chapter and verse' on organisation and structure, they do want clear lines of sight, accountability and sanctions when there is consistent underperformance.
- 2.4 A key part of boosting regional prosperity is through making improvements to transport so that people will consider travelling further for employment and other reasons. Our research shows that addressing issues around fares and tickets is an important part of this, particularly where they make travelling easier to understand and use, and more convenient. These must, though, sit alongside improvements to infrastructure and timetabling.

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<sup>1</sup> [Bus passengers have their say: Trust, what to improve and using buses more](#). Transport Focus. 2016

- 2.5 Criteria and policy objectives for local bus services should be geared towards building service provision on passenger priorities, rather than on cost alone and authorities would be expected to be monitoring the effectiveness of their spending in delivering their policy objectives and understanding how these are performing in meeting passengers' needs.
- 2.6 It is not clear how separate Joint Transport Authorities (JTAs) would relate and co-ordinate across regions, or how a national JTA would function alongside – or differ from – Transport for Wales. The previous transport consortia were the established route by which development proposals could be 'promoted' from local authority level, could have match funding drawn together and prioritised for implementation and delivery, on a regional basis. The new structure will need to have this kind of functionality and passengers' interests at its heart.
- 2.7 Good practice is being built in a number of locations. The West Midlands Bus Alliance (chaired by Transport Focus) was the first of its kind in Great Britain. It brings together bus operators, local councils, and other partners to focus on improving passenger journeys. Investment and concentration on service delivery over three years are driving improvements. The Bus Passenger Survey<sup>2</sup> is showing more passengers are satisfied with their journey and feel it was good value for money. In 2017, the Alliance renewed its commitment to improvements for passengers, with 50 deliverables<sup>3</sup>. The effectiveness of this model is being shown in the achievements<sup>4</sup> now published, which include:
- Tackling congestion and making bus journeys quicker, with funding secured for bus priority measures
  - Improving bus emissions standards, through retrofitting and funding new vehicles
  - Making bus travel more attractive for young people, with discounted travel available to all 16-18 year olds
  - Making bus journeys better value, with low fare zones and discounts through 'pay as you go'
  - Further measures, which are making it easier to buy tickets, catch the bus and reshape the bus network to deliver economic growth.
- 2.8 Welsh Ministers should also have a crucial role in providing guidance and direction; and prime accountability. The closer that national strategy is aligned with passenger priorities the better the potential service for passengers. In an era of cost consciousness and efficiency it will be essential that scarce resources are focussed on the things that deliver the biggest passenger 'dividend'.
- 2.9 The structure needs to work in the best interest of passengers, including the ability to co-ordinate and set national standards and systems across journey planning, ticketing, real-time information and investment potential. These elements also require co-ordination and partnership regionally for local service delivery, with the perspective of door-to-door network service provision. It is also vital for service change proposals to be communicated and tested through robust and effective public consultation.

<sup>2</sup> [Bus Passenger Survey](#). Transport Focus. 2019

<sup>3</sup> [Bus Alliance Deliverables](#). West Midlands Bus Alliance. 2017

<sup>4</sup> [Bus Alliance Achievements](#). West Midlands Bus Alliance. 2018

- 2.10 From a regional perspective, this will provide an opportunity to review the bus service registrations process and appropriate authorities, which we discuss in section seven.
- 2.11 Our research<sup>5</sup> shows investment is also needed in improvements for young people. In some respects, young people want the same thing from their bus journey as their fellow passengers, ranking value for money, punctuality and reliability highly as priorities for improvement. However, there are key differences:
- They don't feel that services are designed with them in mind or that enough is being done to make them feel valued
  - Not knowing how the system works or what to do is a barrier and a source of anxiety about 'getting it right'
  - Improving the journey experience is important; young people notice poor quality provision
  - There is a need to design systems better, learning from other industries in the way they appeal to young people
  - Fares for young people are confusing and inconsistent.

### 3 Enhanced Quality Partnerships

- 3.1 Transport Focus's research gives good understanding of passengers' expectations and aspirations. We have published insight into passengers' priorities for improvement, across a section of rural, urban and metropolitan areas, ranking 31 different criteria<sup>6</sup>. [We have also produced a 'simulator' that allows the research to be broken down by different characteristics - e.g. by bus operator, by region, by journey purpose and by passenger characteristics - age, disability etc.]<sup>7</sup>
- 3.2 The top five priorities for improvement from our research were:
- Better value for money from bus journeys
  - More buses arriving on time at your bus stop
  - More journeys on buses running to time
  - Buses running more often than they do now
  - More effort made to tackle any anti-social behaviour
- 3.3 We believe that a partnership approach between authorities and operators can help to address all these issues.
- 3.4 Partnerships are vital in addressing punctuality. Our research shows that some of the main causes of delay are outside the direct control of the bus company, for example: delays to the bus because of parked vehicles or vehicles being loaded or because of highway design (narrow roads, poorly designed junctions)<sup>8</sup>. A partnership approach to unblocking these should be more effective for passengers.
- 3.5 We know from our research that passengers want a sense that their views on performance and services matter<sup>9</sup> – this means creating mechanisms to capture views (either directly or via representative bodies) and then to act on them. One of the best ways of ensuring this happens is to build incentives or targets into any agreement. Our strong

<sup>5</sup> [Using the bus: what young people think](#). Transport Focus. 2018

<sup>6</sup> See footnote 1

<sup>7</sup> [Bus passengers have their say - simulator](#) Transport Focus 2016

<sup>8</sup> [What's the holdup? Exploring bus service punctuality](#). Transport Focus. December 2014

<sup>9</sup> See footnote 1

preference is for these targets to be based on what passengers think – the best judge of quality being those who have used the services in question. This could encompass a range of criteria covering the bus stop, the bus and the driver. This is a technique that is already being successfully used within rail franchises.

## 4 Franchising

4.1 In addition to our work on passengers' priorities, Transport Focus also conducts the Bus Passenger Survey (BPS)<sup>10</sup> to find what passengers think of the current service provided. In the autumn 2017 wave we spoke to around 48,000 passengers, including more than 4,800 in Wales; to produce a picture of satisfaction with bus travel. BPS measured passengers' satisfaction with their local bus service for a wide range of aspects including the bus stop, waiting for the bus, on the bus, the outside of the bus and the bus driver as well as their overall satisfaction with that bus journey and their rating of value for money.

4.2 These, together with our bespoke research on a number of specific issues, give us a good understanding of the core issues that a franchise should look to address, measure and audit. We would therefore make the following recommendations:

- Set clear targets for punctuality
- Identify the mechanism through which performance will be monitored
- Identify sufficient 'back-office' support and expertise to achieve this
- Commit to publishing key performance data
- Include a clear commitment to minimise the number and frequency of changes to the timetable and to establish fixed dates when these will take place.
- Establish a process for consulting/informing passengers of such changes
- Include a real time customer information action plan. The extent will depend on the size and scale of the franchise. However, the default should be towards real time passenger information at bus stops - passengers should not have to stare up the road wondering if their bus is coming
- Support and promote a central, amalgamated pre-journey information source where passengers can find out more about fares, ticket types and bus route information across different bus operators, including planned developments with smart ticketing
- Identify and implement specific policies to meet the needs of young people, particularly 16-18 year olds. This to include the range of tickets, marketing and visibility of the price
- Identify standards of behaviour for drivers and require bidders to identify training programmes for drivers that include customer service skills alongside traditional content
- Identify clear complaint handling processes and lines of responsibility between the bus company and the local authority and demonstrate how the complaints will be monitored and used in making service improvements. Establish standard response times and criteria for passenger compensation. Publicise the scheme with contact details in a passengers' charter – and report delivery against the scheme
- Establish targets and a monitoring mechanism for monitoring service quality and commit to publish the results
- Require bidders and specifiers to work together in identifying and dealing with anti-social behaviour and ensure that security is considered as part of any design guidelines covering bus stops and buses
- Require bidders to submit a passenger engagement strategy setting out how they will engage with passengers and how they will use the information gathered through this
- Include strategies for boosting bus use.

<sup>10</sup> [Bus Passenger Survey](#). Transport Focus. 2018

- 4.3 There is a tendency to view franchising as something that will apply on a grand scale analogous to what takes place with Transport for London (TfL). Looking at franchising purely through this lens would suggest that it is something that fits larger operators rather than smaller outfits.
- 4.4 However, we are given to understand that franchising does not have to be a one-size-fits-all approach – it could be on a city-wide basis or just apply to a sub-set of services or geography within the authority’s area. If so, a franchise could be on a TfL scale or it could potentially be as small as a single route within an area. The latter would presumably be more attractive to small or medium operators. If this is indeed the case, then it would be helpful for the guidance (or any secondary legislation) to provide clarification.
- 4.5 Transport is not the sort of market where people can ‘vote with their feet’ if they don’t like a provider. Generally, they rely on their local service to make essential journeys and have little choice of any alternatives. It is therefore essential for transitional arrangements to be in place to safeguard provision for passengers. The core principles of the Bus Services Act 2017 require a minimum of six months’ transition to adapt to franchising plans.

## **5 Local Authority Bus Services**

- 5.1 We commented on municipal bus companies during the passing of The Bus Services Act 2017 (in England). Our submission pointed out that municipally-owned bus companies consistently score well in our Bus Passenger Survey satisfaction research, with some being among the best performing service providers. We also argued that any concerns about the potential for anti-competitive behaviour could be addressed through existing competition law.
- 5.2 It is crucial that any change to the bus sector puts passengers at the heart of developments. We know from our research that passengers want a sense that their views on performance and services matter<sup>11</sup> – this means creating mechanisms to capture views (either directly or via representative bodies) and then to act on them. One of the best ways of ensuring this happens is to build incentives or targets into any future arrangements or bus company framework.

## **6 Eligibility age for mandatory concessionary fares**

- 6.1 In our response to the Welsh Government consultation on the mandatory concessionary fares scheme, we raised a number of points. Those who are approaching the age of 60 will resent the postponement of the concession until they reach women’s pension age. Clearly the Welsh Government has to balance its view on the cost of the scheme overall. In Greater London the concession at age 60 has been retained even though elsewhere in England the UK retirement age applies.
- 6.2 However, we accept that life expectancy is increasing and that as a result working lives will be longer. By that token, at some point it follows that the age of qualification will need to be reviewed, especially if the concession is to remain affordable to the Welsh Government and available to those who rely on it. However, any such increase should be introduced incrementally and communicated well in advance. A staged implementation would help to minimise frustration for those near 60.

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<sup>11</sup> See footnote 1

6.3 Our work on bus passengers' priorities for improvement<sup>12</sup> shows that value for money is the top priority for paying passengers. Therefore, any expectation of passengers continuing to pay for longer needs to go hand-in-hand with improvements in what they are getting in return – key factors being punctuality, reliability and frequency.

## **7 Public Transport Information and Monitoring**

7.1 Requiring the release of open data will find favour with passengers, and be a significant advance over current provision, if information about routes, timetables and fares are made available in a consistent and reliable way. The addition of fares and punctuality information to what is already provided will be a key advance. The availability of such information needs to be promoted and it needs to be user-friendly, and benefits for passengers are likely to depend on how well this is done.

7.2 When considering the information needs of passengers it is important to distinguish between, on the one hand, commuters/other frequent users making familiar trips and, on the other, infrequent and non-users and those making unfamiliar trips.

7.3 Passengers travelling frequently and making familiar trips are likely to place disruption information on their priority list, whereas infrequent passengers making unfamiliar trips are likely to focus first on:

- How can I get from A to B?
- Where do I get on/off?
- When do I need to leave home? What time will I arrive? Can I rely on this?
- How much will it cost and how do I get a ticket?

7.4 Passengers contemplating an unfamiliar journey may be anxious about, for example, arriving late for work or missing a doctor's appointment. They may be worried about missing their stop. Or they may be embarrassed about not being allowed on the bus because they have the wrong ticket or because there is no space for their wheelchair.

7.5 Our research with young people<sup>13</sup> in particular, highlighted their two-stage process for planning a journey: what is quickest and most convenient for me? How much will this cost me? It also found that space on young people's phones is limited and therefore valuable. Apps must first stand out as interesting enough to download and must then prove their worth through relevance and usefulness to earn a permanent place. Young people like using Google Maps and are reluctant to download additional apps that do the same thing.

7.6 Reliable, real-time information is key to helping young people feel confident when using the bus and improving their journey experience. They want easy-to-use, centralised and streamlined information, visual mapping and the ability to personalise their journey across modes and operators. Young people want systems to 'hold their hand' through the experience and create a sense of understanding and familiarity. This includes fares shown with journey plans and at bus stops, clear information on discounts and easy ways to pay through smart and contactless. They also want information that updates along the journey, especially during delays, to give the cause, revised journey times and

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<sup>12</sup> See footnote 1

<sup>13</sup> See footnote 5

connections, supported by announcements and screens on board.

- 7.7 Our research into what bus passengers think about punctuality and timetables<sup>14</sup> shows they feel that punctuality data, independently audited, should be published and made available to regulatory bodies even if most passengers have little appetite for searching it out. Information should be as granular as possible – to be as close as possible to reflecting a passenger’s individual experience. Information that is an average for your area or the company concerned was felt to lack value, since they would not be able to extrapolate what it means for them personally.
- 7.8 Transport Focus feels that there is a strong case to require publication of punctuality data, to provide the following benefits:
- It is an important principle that customers should have information about the product they are using
  - It is likely that transparency about performance will result in greater focus on improving it than would otherwise be the case.
- 7.9 Reviewing the provision of powers around bus service registrations is an important step. Our response to the DfT consultation on bus registrations<sup>15</sup> supported the introduction of 14 days’ pre-advice to local authorities, not least because in the context of reductions in the level of service it gives more time for a local authority to consider passengers’ needs, enter into discussions with the operator and, if necessary, consider whether to invite tenders to provide a replacement service.
- 7.10 We also added that there are strong arguments that electronic bus service registrations (EBSR) should be introduced comprehensively as quickly as possible and we encourage serious consideration of this. We see two principal reasons:
- Accurate and comprehensive timetable information: comprehensive EBSR is likely to significantly improve the quality of timetable information available to passengers, supporting open data availability through websites and apps; ensuring not only that journey planners are accurate on ‘day one’ of a new timetable but that they give accurate information to passengers enquiring now about journeys that will take place after a service revision. We see a strong argument that providing a timetable electronically in a standard format that allows passenger information to be provided accurately and comprehensively should be one of the minimum obligations associated with running a bus service.
  - Transparency: comprehensive EBSR would also give considerably greater transparency about the service changes being proposed. It would give passengers, as well as those who represent them such as local authorities, parliamentarians and voluntary user groups etc., the opportunity to properly understand what is being proposed and its impact.
- 7.11 In terms of public transport monitoring, we have concerns about where the independent voice of the passenger is heard. Transport Focus had a seat at the previous transport consortia and also on the Public Transport Users’ Advisory Panel; providing independent understanding of passengers’ attitudes and behaviours, together with commissioning of research to bridge gaps in that. However, with the winding-up of those bodies, it is not

<sup>14</sup> [How late is late? What bus passengers think about punctuality and timetables](#). Transport Focus. 2014

<sup>15</sup> DfT consultation on the implementation of Competition Commission remedies on bus registrations. Transport Focus. 2014

clear where the role now lies. We believe that there is a strong case for a multi-modal approach to consumer representation in the transport sector in Wales, to maximise benefits for transport users.

- 7.12 We believe that the ability to take this approach with our remit in England has resulted in continual improvements and benefits for consumers; in:
- Improving the flow of information before and during disruption (both planned and unplanned) so as to minimise the impact on passengers
  - Benchmarking levels of passenger satisfaction for rail, bus and tram passengers and using this information to drive improvements from both operators and regulators
  - Using the data gathered from complaints to highlight areas of consumer detriment
  - Enabling development of a highly professional research capability that contacts over 120,000 users a year, asking for their views and then using this information to influence decision makers
  - Providing the base to develop and modernise our approach to consumer engagement through innovative research methods (emotional tracking, social media, trust, consumer panels) and through direct engagement with decision makers.
- 7.13 We believe that the specialism, credibility and relationships developed through this approach are critical to achieving successful outcomes for transport users – through gathering information and providing something that is both useful to, and trusted by, decision makers and makes a difference. This multi-modal approach also helps secure additional benefits for consumers in identifying and assessing lessons learnt in one sector and applying them effectively in the others.
- 7.14 Our research suggests that passengers want their operator to be accountable, with published data to ‘keep the industry honest’. The National Rail Passenger Survey plays an important role in formal and independent measurement of rail service delivery and is now providing the means for writing this accountability into new franchise specifications as well as providing a means of benchmarking services across different regions. We believe that in a similar way, a consistent and benchmarked approach, such as delivered by the Bus Passenger Survey, focuses industry attention on key areas for improvement, alongside intelligence on drivers of satisfaction. Wales was included in the Bus Passenger Survey<sup>16</sup> in 2017. Repeating this would provide a robust basis for monitoring service delivery and securing continued improvements; with the published accountability that passengers seek.
- 7.15 Although the Bus Passenger Survey gives feedback from passengers’ journeys, there is also a need to understand the views of those who don’t use buses, have recently stopped, or don’t have a service they can use. This would provide understanding of their decisions, perceived barriers and potential for policy actions to attract and encourage more people to use public transport.

## **8 Taxis and Private Hire Vehicles**

- 8.1 Provision of national standards for taxis and private hire vehicles in Wales would give assurance and consistency for transport users. In addition, the ability to include taxis within service networks would add to the toolkit that authorities have to support door-to-door journeys, especially in rural areas.

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<sup>16</sup> See footnote 10



- 8.2 It is equally important that service standards are supported by appropriate enforcement, to offer protection and recourse for service users.
- 8.3 We have researched users' views of pre-booked community buses and shared taxis<sup>17</sup>; concluding that these can offer a way of providing a service where one might not otherwise exist at all and contribute to meeting the transport needs of isolated communities, particularly if introduced as part of a wider review with full public consultation. However, this also needs to be viewed in the context that reductions in service frequency tend to be accompanied by falls in patronage, so financial savings to local authorities are often achieved at a longer-term cost.
- 8.4 We are also mindful that the way people want and chose to travel is changing and that this can have an impact on the demand for conventional bus travel. Since our report on demand responsive travel in 2016 there has been a big increase in the number of new on-demand travel options, including services such as Uber. Initial experience of some of these new app-based initiatives shows encouraging signs about the potential to encourage young people and car drivers to travel more by public transport. It will be important that these new services and changes to traditional travel patterns are taken into account.

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<sup>17</sup> [Demand Responsive Transport: users' views of pre-booked community buses and shared taxis](#). Transport Focus. 2016