

Wales national transport strategy delivery plan Consultation response

Introduction

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. Our subsidiary Transport Focus Wales was set up to give focus to representing Welsh transport users. We have a Board Member for Wales appointed by Welsh Ministers.

Transport Focus welcomes this consultation. Our response is informed both by our extensive evidence base and insight gathered through the engagement of our work in Wales.

We are responding to this consultation, building on our [response](#) to the Welsh Government consultation 'Llwybr Newydd – New Path', a new transport strategy for Wales.

Consultation questions

Question 1:

Do you think the plan will have a positive impact on the Welsh Government targets for creating modal shift to more sustainable forms of transport?

Transport Focus believes that the delivery plan will have a positive impact upon the Welsh Government targets for creating modal shift to more sustainable forms of transport. Key, however, is execution of the plan which will require rigorous monitoring to ensure things stay on track.

Addressing barriers is central to encouraging modal shift. Across our work, perceived barriers are shown repeatedly under three main headings:

- **Cost:** value for money in return for the price of the ticket, availability of discounts and flexible tickets, comparison of the expense when considering an alternative, especially when a group is travelling together
- **Convenience:** including availability of the network, ability to make door-to-door journeys, time taken, potential to work or relax and familiarity of always travelling a particular way or not knowing how to do it another way. Smart ticketing needs to be a convenient option that is easy to use and makes passengers' lives easier
- **Complexity:** lack of familiarity with journey planning, especially factoring in connections, difficulties with timetables, interchange or access, availability of facilities and uncertainties undermining confidence to travel.

Investment decisions need to take these factors into account alongside understanding the journeys people want to make, to be able to provide attractive options. Our response to the Wales Transport Strategy also concluded that to encourage modal shift, priorities must be at the heart to support a joined-up network, for better connectivity; better punctuality and reliability; better value for money, with flexible and innovative ticketing.

The network needs to work for a wide range of people. Many do not have a choice over how they make their journey, so it is essential for their needs to be supported. For those who do have a choice, the factors and barriers outlined above must be addressed to provide an attractive proposition for influencing that choice. Issues such as cuts and driver shortages create gaps in services and unreliability. Investment is needed to underpin services and provide a positive experience that together create a firm foundation for growth.

The delivery plan must be collaborative to create seamless door-to-door journeys. Delivery cannot gain any rough edges and the pieces need to work together. Unreliability on the railway or gaps in the bus network must be resolved to provide an attractive proposition creating the right pull factors. Push factors will also be needed to nudge people towards making different travel choices. Recent studies¹ assert that every person shifting two car journeys per month onto public transport is needed to achieve decarbonisation targets by 2050. Achieving this will need combined measures of carrots, sticks and nudges.

It is encouraging to note that the delivery plan (p33) commits to bringing together roads, active travel, bus and rail in Wales with other transport modes to think in a holistic way about travel from the customer perspective. However, the customer perspective is not currently represented in a holistic way, so we would welcome discussions on how this can be strengthened.

The delivery plan (p. 30) outlines a commitment to simplify fares, tickets and timetables, and also to improve affordability by exploring 'Fairer fares' across Wales. It is laudable that affordability has been recognised as a potential barrier for some in terms of using public transport. Transport poverty has been exacerbated by the current cost of living crisis and those who may have been able to afford transport previously, may now be struggling to balance their finances. We know that certain groups are particularly impacted by transport poverty such as people with disabilities, women and older people. Whilst we recognise the immense financial challenges in the sector and more widely, we feel that more could be done to give passengers and potential passengers better affordability. This could involve more robust promotion of discounts and potential cheaper ways to travel (e.g. offers, railcards, group / rover tickets) targeted wider than current users to encourage modal shift, better visibility of bus fares (e.g. within journey planners and at bus stops), commitment to retaining cash as a payment method, and addressing fares anomalies. We note there are some good initiatives in Wales such as free rail travel for concessionary pass holders on bus, but on rail, only on certain lines and at particular times of year when there is more

¹ [The Decarbonisation Dividend](#), Confederation of Passenger Transport and WPI Economics. July 2022

free capacity (e.g. Heart of Wales line 1 October to 31 March). There is also free travel on rail for under 16s (with certain restrictions), however this is rail only. There is no consistency between modes which shows some inequality (since not all will be geographically located near to rail). Improving value for money and affordability is key to encouraging people to use public transport and involving passengers and potential passengers in the discussions around fares and affordability will be vital.

We further note the commitment (p34) to ‘one network, one timetable, one ticket’ and to explore ways to make it simpler for customers to buy tickets and pay for door-to-door journeys. We would like to see these commitments strengthened from being exploratory to implementing firm proposals. Digital exclusion could potentially be a barrier to using public transport, so any move towards increased digitisation, must consider those who do not have access to digital means to pay or use services (e.g. access to timetable information, journey planning, payment). For some, confidence to use technology could be the barrier rather than access. This segment will need support to make the transition to using technology with confidence, so schemes which support this will be invaluable.

There is reference in the delivery plan (p.49) to commit to improving cycle accommodation on board public transport. This will be key to ensuring passengers have smoother multi-modal journeys which incorporate active travel. We know that work is ongoing with cycle trains on the Heart of Wales line, in a similar vein to ScotRail’s Highland Express, but it is important that there are equitable arrangements across the network. The experience of usage and any learning from the Heart of Wales line should feed into any future plans for similar schemes on other parts of the network. The scheme will also need to consider connectivity with other services, since if there is a larger capacity of storage on one part of the network it may result in some challenges when larger numbers of cycles from the Heart of Wales line need to connect with other Transport for Wales or other operator services which do not have the same cycle capacity.

Multimodal journeys which involve active travel elements should be made as simple as possible e.g. to reserving spaces on board, clear designated cycle spaces that are easy to use and secure, effective labelling of carriages and staff support on platforms and on board services.

It is noted that there are plans to add cycle storage capacity on Traws Cymru services, this would be most welcome, particularly as these routes are being joined with rail provision within journey planners to provide integrated and faster services. It would, however, need to be done in a way so as not to cause delays to services when boarding/exiting since we know from our research² that more buses on time at the stop, and more bus journeys on time are key priorities for passengers. We would advocate early passenger involvement in the design to ensure it meets the diverse needs of those who wish to use it.

² [Bus passenger priorities for improvement](#), Transport Focus 2020

Question 2:

Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

Sustainable Transport Choices

The plan is positive in setting out the key aspects in terms of delivering the Wales Transport Strategy, however in terms of getting people to switch to more sustainable modes, there are some barriers to overcome which will require focus. Many of these are attitudinal and relate to people's understanding of sustainability as a concept and the role they play or could play in helping the government to attain its climate change goals. We recently conducted research³ on people's attitudes towards sustainability and subsequently delved more deeply into the topic of sustainable transport. The research suggests there are significant challenges to overcome to encourage people to make sustainable choices, which will thus contribute to reduced greenhouse gas emissions.

We found:

- There is a basic understanding of sustainability, but it is too vague to feel actionable
- Some do not identify with sustainability, seeing it as a personal choice
- Because change feels beyond their control, people expect (and mostly accept) that change will come from
- Sustainability is not a key driver of transport decisions, and it will struggle to become one (most people base decisions on safety, convenience and cost).

In terms of sustainable transport, people see it as:

- **Expensive:**
 - cost of buying electric vehicles
 - cost of public transport – especially for families
 - general sense (from grocery shopping) that sustainable = expensive.
- **Inconvenient**
 - compromising what is important to them – in other words not getting the speed/directness of travelling by car
 - public transport associated with discomfort, stress/uncertainty (particularly in the context of a pandemic).

We explored what would changes people felt they could reasonably make to be more sustainable in relation to their transport choices:

- **Smaller changes** – everyday decisions
 - Walk or cycle more often, even for one journey a week
 - Consolidate journeys and plan better
 - Shop differently
 - Car pool

³ [The journey towards more sustainable travel](#), Transport Focus, 2021

Though people are also quick to point out that these ‘ideas’ are not always practical or feasible.

- **Bigger changes** – lifestyle decisions
 - Buy an Electric Vehicle (the only choice seen to retain convenience while reducing emissions)
 - Move closer to public transport

These changes are harder to make and can feel completely out of their hands.

We identified some possible interventions:

- **Personal**
 - Any change needs to feel minimal to the individual, but effective in terms of addressing the problem.
 - It needs to be measurable and something people can tangibly engage with – let them know that small changes are okay. Need to be encouraged that do not have to make a huge change
- **Social**
 - Don’t always lean on sustainability as a key driver – avoid the identity/badge and focus on other benefits of sustainable behaviours.
- **Structural**
 - Local and central government and industry need to lead the way – force change. It will require a combination of national and local initiatives.
 - Businesses need to innovate visibly for the future to provide confidence that change is possible and desirable.

These are things which will need to be considered when trying to encourage people to switch to more sustainable modes. Communication will be key in terms of getting people to understand the urgency for behaviour change and showing how their efforts to make sustainable choices tangibly impact upon the environment.

Electric Vehicles

We note the ambitious plans for electric vehicle charging facilities across Wales. The charging system needs to meet the need of the end user so it will be critical to ensure that the user experience is factored in to developing this. Transport Focus has undertaken research on user experiences of electric vehicles in England⁴, and there are some useful learnings from this piece of work.

Drivers told us they love their electric vehicles because of the lower running cost (although it is recognised that energy prices are currently rising) and the quieter, more enjoyable driving experience. However, they said that using an electric vehicle requires more effort,

⁴ [Plugging the gap – drivers’ experiences with electric cars](#), Transport Focus, 2021

mainly related to charging. Users want charging electric vehicles to be just as easy as filling up a petrol or diesel car.

They identified improvements that would minimise the extra effort currently required:

- better maintained charging points and more of them to meet demand
- simplify and improve information on planning trips and charging
- tackle the various complications around charging such as different providers.

Mostly, users find charging straightforward, however there are aspects they identified which can cause frustration and these tended to fall under three distinct categories:

- **Reliability** – faults, dependency on an app and customer support
- **Complexity** - as simple as using petrol or diesel pumps (simple and coherent payment methods across providers)
- **Physical (Location)**
 - concerns about personal safety when charging points are tucked away in the periphery of a car park, in areas that are poorly lit
 - Concerns about being exposed to the elements (which you would not get at a petrol station)
- **Physical (Access)**
 - physically finding the chargepoints within a large car park, partly because signs are felt to be less good than to petrol/diesel pumps
 - sometimes sharing the space with other facilities, for example for air and water top up
 - sometimes being on private land which can be closed off 'out of hours'
 - sometimes located in awkward spots which are difficult to manoeuvre into or out of.

Additionally, it is important to ensure that charging points are accessible, e.g. to people with disabilities.

Question 3:

To what extent, within the funds available, do you think the plan will meet the headline 5-year priorities set out within Llwybr Newydd: The Wales Transport Strategy 2021?

Question 4:

To what extent, within the funds available, do you think the plan will meet the well-being ambitions set out within Llwybr Newydd: The Wales Transport Strategy 2021?

Question 5:

To what extent, within the funds available, do you think the plan will meet the 5-year priorities set out within each of the modes and sectors mini-plans in Llwybr Newydd: The Wales Transport Strategy 2021?

We respond to questions 3, 4 and 5 together.

The current state of flux within the economic environment and period of high inflation makes it difficult to determine with any certainty how well the level of funding will facilitate the execution of the plan. We recognise that there are huge challenges in relation to funding, not just affecting the transport sector. Whilst the plan sets out the available funding there is a risk within the current economic climate that funding will not go as far as intended. As a consequence this may result in having to scale back and prioritising areas that are likely to have the most impact on meeting targets. It will also need to consider areas that are priority areas for users and would-be users of public transport and active travel. Our research on passenger priorities identifies the core passenger needs from public transport. It will be important that there is a transparent approach with the public when difficult decisions have to be made.

Following the pandemic, there is a risk that demand may not recover to pre-Covid levels, with a mixture of increased working from home, modal shift to car or residual concerns about personal safety on public transport. The transport industry faces a potential drop in revenue that threatens the viability of services. However, at the same time it is important that the industry gives passengers (and potential passengers) a sense of stability. If someone is going to make a big decision to give up their car and rely on public transport then they need to be confident that the bus or train will run next month/year. The future model in Wales will need to provide some stability when it comes to funding if it is to retain confidence in public transport.

The closer that national strategy is aligned with passenger priorities the better the potential service for passengers and the more attractive for encouraging modal shift. In an era of cost consciousness and efficiency it will be essential that precious funds are spent on the things that we know rail and bus users value and want to see improve.

Our research⁵ shows that rail passengers' top priorities for improvement are reliability and punctuality, value for money and getting a seat. In Wales, the importance of value for money is greater and clean toilets, comfort onboard and environmentally friendly journeys are placed higher. Younger passengers also place higher importance on more environmentally friendly journeys, along with better information during delays, fewer disruptions and good connections. Passengers with a disability put clean toilets, improved personal security and step-free access higher on their list.

For bus passengers, our research⁶ shows better frequency, reach of the network and punctuality are of key importance. Younger people place higher importance on free wi-fi and faster journey times, whilst middle-aged passengers see value for money as more important. Non-users put buses going to more places at the top of their list, across all age groups. Discounts for teenagers are higher for younger people and for middle-aged and

⁵ [Rail passengers' priorities for improvement](#), Transport Focus. July 2020.

⁶ [Bus passengers' priorities for improvement](#), Transport Focus. September 2020.

older people, better value, bus stops closer to home or destinations and services running earlier and later in the day would be more attractive.

Tables of priorities for improvement are collated in **Appendix 1**, from our research in 2020. This is currently being updated and we will be pleased to share the fresh results with you very shortly.

Question 6:

Do you think the plan provides the right balance between the modes and sectors to meet the Welsh Government ambitions set out in Llwybr Newydd: The Wales Transport Strategy 2021?

Plans for bus reform have also been the subject of recent consultation. Our [response](#) to Welsh Government concluded that we would be looking for bus reform to consider some very key aspects to ensure it meets the needs of users and potential users:

- Ensuring that priorities identified via our research are at the very heart of proposals
- Understanding and addressing the key barriers to bus use
- Creating an attractive, accessible network that encourages modal shift and links effectively with active travel opportunities
- Ensuring passengers and stakeholders are involved in the development of a passengers' charter – co-production is vital.

Pivotal to the success of the delivery plan will be keen oversight and scrutiny across modes and sectors. Whilst it is important to provide a focus for each mode, it is important that they do not become fragmented. The plans need to be reviewed holistically at regular intervals and leads need to work together to ensure that where there are interdependencies, that activity is kept on track.

Question 7:

Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

Climate change resilience

Climate changes are apparent across the transport networks, with key examples in very recent experience. Welsh Government and transport providers need to think more about how to deal with these extremes and, just as important, what information is given out to transport users. Strong themes emerge across the modes from Transport Focus work in this area:

- strengthen infrastructure to withstand worse weather
- learn and practise how to sort out problems more quickly
- tell people what is going on honestly and in plain language.
- Strengthen the ability of public transport vehicles to cope with hot / extreme weather

As an example in the rail industry, in July 2022, extreme heat caused a significant impact on the railways which is an example of the growing importance of tackling climate change. We undertook some research⁷ about the impact this had upon passengers. Whilst not specifically looking to address infrastructure issues, the research did give some useful insight into some of the things going forward that will be important for passengers, particularly when considering rail fleet, but will be equally applicable to other modes. Some key findings were around the importance passengers attached to good quality air conditioning to ensure comfortable journeys. We posited the following questions:

- Does the industry attach sufficient weight to keeping air-conditioning systems functioning properly?
- Is the replacement rate for older trains without air-conditioning sufficient given the potential for more frequent extreme heat in coming years?
- Given a probably 30 years plus economic life, are the standards to which new trains are built sufficiently future proofed in terms of extreme heat? Including effectiveness in higher outside temperatures; sustainability in the event of loss of external power; and adequacy of airflow inside the train when stationary without the system functioning?

We also noticed that during hot weather, complaints about the conditions on board trains in Wales featured significantly within passenger interactions via social media. We recognise that in Wales, in the not-so-distant future, most passengers will be travelling on new trains, so this is likely to mitigate against some of the issues, but it is important that there is a focus on managing the on-board environment at some level to ensure passengers can be ensured comfortable trips, and that heat does not become a barrier to using public transport.

Fflecsi demand responsive transport

It is heartening to see that rural isolation features prominently within the report, as this has wider implications than just getting passengers where they need to go, but also in a wider context in terms of tackling loneliness. Demand responsive transport (Fflecsi) will play an important role in the overall transport mix, particularly where non-viable fixed route bus services have been curtailed or where existing access to public transport is poor. Our recent research^{8 9} on the Fflecsi demand responsive transport service conducted on behalf of Transport for Wales, shows that perceptions of the service are generally favourable, although there are some valuable lessons learned from the initial pilots.

Some barriers were identified, for example:

- lack of awareness of the service

⁷ [Extreme heat, July 2022: the passenger experience](#), Transport Focus, August 2022

⁸ [Fflecsi – the experience of DRT in Wales - Interim report](#), Transport Focus. February 2022

⁹ [Fflecsi – the experience of DRT in Wales - Updated report - findings from passenger research in Newport](#), Transport Focus. August 2022

- lack of understanding around the Fflecsi proposition
- lack of mobile signal / access to a smartphone
- need to plan ahead
- access to a car
- reliability on a deadline.

There were also lessons learnt in terms of how the Fflecsi model works in a rural and urban environment. It is important that the learning is applied to any new modelling of services in Wales, but also that consideration is given to how it could be shared more widely across other areas of the UK. Transport Focus has been heavily involved in the Bus Service Improvement Plans in England, and is aware that demand responsive transport features in many of these plans/schemes. The enhanced partnerships involved would benefit from learning from the experience in Wales and continued dialogue around DRT implementation in England.

Local needs

Local transport needs can be very specific, and there are some good examples of community-led initiatives that can plug gaps (e.g. cycle pools to improve access to cycling opportunities, local dial-a-ride initiatives to support groups with specific needs etc). There have also been area-specific bus travel initiatives such as the one introduced in Swansea during holidays to help families and aid post covid recovery of bus patronage. It is important that such schemes are robustly evaluated and learning shared more widely. There are many examples of good work within various local authority areas, but how can this be more joined up? How can learning from some of these pilots / initiatives be accessed more easily to support the wider transport delivery plans?

We recognise that the plan considers planning for the need not to travel. The covid pandemic has acted as a catalyst to force organisations work differently since they have had to adapt to a changing and uncertain environment. Many people are now able to work from home, with employers changing the way they work to adapt to the new normal. Cognisance must be given, however, to those who by the very nature of their employment are not able to work from home or local hubs. Welsh Government will need to work with employers to ensure that the needs of those who do need to travel are met – these are often those in lower paid roles, or are in essential services. Consultation with transport users is vital.

Plans should also account for the changing face of transport use and rise of leisure travel, maximising the attraction with differentiated discounts and tickets and linking offers with destinations and tourist sites, supported by the reach of transport services, understanding and matching demand.

Personal safety

We know from our research that personal security is high on the agenda for passengers, therefore it is reassuring to see that this is recognised in the plan. It is vital that people feel

safe whilst using public transport, particularly when travelling late in the evenings. Feeling safe is likely to influence modal choice, so if people are being encouraged to use sustainable modes, suitable arrangements need to be in place. Our recent rail user survey¹⁰ (26 August) indicates that overall satisfaction with personal security stands at 84 per cent, with a similar picture from our recent bus user survey¹¹ (26 August) with 85 per cent satisfied. In terms of how satisfied people are with the behaviour of other passengers, for rail, satisfaction is 74 per cent, while bus is 77 per cent. Behaviour of other passengers can influence satisfaction levels so where there are issues, these need to be addressed to ensure passengers feel comfortable travelling – key is understanding where these issues lie so they can be effectively addressed via communication / education campaigns, and / or enforcement and multi-agency working.

Furthermore, our bus passenger priorities for improvement¹² research shows that tackling anti-social behaviour on board buses is a key passenger want in terms of service improvement (ranked as sixth priority).

Our partner organisation London TravelWatch has undertaken some recent research¹³ about the experience of personal security on board public transport and maintain updates on their [dedicated campaign page](#). Whilst this research focuses on passenger experiences within London specifically, there are likely to be some themes that are prevalent across Great Britain. The report highlights:

- Young people, women, disabled and Black, Asian and Minority Ethnic transport users were at greater risk of victimisation from other people
- 38 per cent of disabled transport users have experienced a hate crime or harassment over the last 3 years
- Nearly one in four women had experienced unwanted sexual behaviour in the last 3 years
- Over 70 per cent of people who felt unsafe have stopped travelling at certain times of the day
- Over half of people felt it was neither easy nor straightforward to report a crime on public transport

The report outlines 28 key recommendations which should be adopted by decision-makers, transport providers and policing authorities, including the British Transport Police and Metropolitan Police. Recommendations include:

- Create a safer travelling environment through CCTV and staff presence
- Make Public Sexual Harassment (PSH) a crime
- Create a playbook for how to be an Active Bystander

¹⁰ [Rail User Survey](#), Transport Focus, 26 August 2022

¹¹ [Bus User Survey](#), Transport Focus, 26 August 2022

¹² [Bus passengers' priorities for improvement](#), Transport Focus 2020

¹³ [Personal security on London's transport network – recommendations for safer travel](#). London TravelWatch, January 2022

- Better use technology to make the reporting process easier
- Authorities need to work harder to build trust in the reporting process

Whilst we are currently in a phase of ‘living with covid’, there needs to be a continued focus on maintaining safety on public transport in a public health sense. The delivery plan will need to be able to flex and step up to any future changes in this area so that appropriate mitigations can be put in place if required. We know from our research that there is still some anxiety around travelling on public transport, particularly those in vulnerable groups and it will be vital to ensure that cleanliness remains a high priority.

It is noted that the plan makes reference to the fact that women and minority groups are more likely to use bus, but more money is being put into rail. There is a need to ensure there is balance in terms of investment between modes so as not to disadvantage specific groups. There is a gamut of research around women and transport, for example the EU Diamond Project.¹⁴ How is good practice and research from across the UK and beyond being identified and considered in building Wales’ transport system?

The ageing population and people with disabilities are factored into the sustainability appraisal which is important. We know that the covid pandemic has impacted specific groups more markedly than others in terms of their propensity to use public transport and their perceptions about how safe public transport is, particularly now that all restrictions have been lifted. We conducted some research¹⁵ to understand why fewer free bus pass holders than fare paying passengers were returning to buses. We asked our transport user panel about their concessionary passes:

- Half of current bus users on our panel who hold a concessionary pass or who are eligible to do so say that the way they use buses has changed since the start of the pandemic.
- 38 per cent say that they are using buses less frequently now in comparison to just 13 per cent who say they are using buses more frequently.
- 49 per cent say that the frequency of their bus use has not changed.
- Two thirds of those who are using buses less frequently than they were before the start of the pandemic say that this is because they are generally making fewer journeys now.
- 35 per cent say that they are using buses less frequently because, in terms of coronavirus, they believe that using a bus is less safe than using other modes of transport
- 25 per cent say that they are using buses less frequently because bus services have been reduced in my local area

There is a clear need to ensure that the network meets the needs of the most vulnerable. The covid pandemic has seen some services cut, and it is important that the network is

¹⁴ [White Paper - Addressing gender-specific needs in Europe’s current and future transport systems](#), EU Diamond Project. 2020

¹⁵ [Getting free bus pass holders back on board](#), Transport Focus, July 2022

considered holistically to ensure where services have been impacted, that gaps are plugged with localised provision/community transport. Work will also need to be ongoing to ensure older people and people with disabilities feel safe travelling on public transport by addressing safety concerns. This is likely to be increasingly important as the colder weather season approaches and the threat of covid infections rising may act as a barrier for these groups.

Question 8:

Do you have any further feedback or comments on the plan?

For the plan to have maximum effect, strong governance procedures, measurement and monitoring will be paramount. The plan does not make clear roles and responsibilities in terms of executing the plan or allocation of funding. Timeframes are lacking which will render it difficult to monitor progress and take remedial action if projects start to lag.

It is acknowledged that people with disabilities undertake notably fewer journeys than non-disabled. There are some key factors to address to ensure the bus and rail environments are more accessible for those with visible and less visible disabilities e.g. accessible vehicles and particularly stations and stops. This is coupled with the need for a commitment for a robust training programme for staff in supporting people with disabilities to navigate the network easily and with confidence.

We welcome the implementation of the new national travel survey, and would be keen to be involved in its development. Transport Focus has longstanding experience in designing and conducting passenger surveys and would be well placed to assist. It would also be pertinent to ensure we are aligned so that transport/active travel users are supported to best effect.

We welcome the opportunity to be involved in the monitoring of the plan via membership of the Transport Performance Board and core reference group. We will add value by representing the voice of users and potential users through feeding in our extensive research base. We do, however, feel that there remains a gap for a more holistic and independent representation of transport users across Wales. Transport Focus has a valued position of influence and a name for credibility. We would be happy to discuss how Transport Focus could help to fill this gap. In addition, our response¹⁶ to the proposals for new bus legislation in Wales highlighted the need for a statutory consultee to provide a trusted independent advocate for the interests of transport users and potential users. Transport Focus would urge for a consultation duty to be written into requirements, to ensure a strong voice is always heard and we would be keen to discuss how we are able to add value in this way.

¹⁶ [Bws Cymru White Paper consultation – Transport Focus response](#), Transport Focus. June 2022

As well as our core work on passenger priorities and satisfaction, we additionally hold a wealth of research¹⁷ on public transport and are active in examining other areas e.g.:

- cyclists, pedestrians and equestrians
- road users (including motorway services, road surface quality and road investment strategy).

We also have a breadth of experience and can provide a useful role in advising on the following matters:

- obtaining a reliable picture of passenger opinion
- development of a Passengers' Charter
- improvements to complaints procedures
- methodology for monitoring performance against passenger growth, punctuality and reliability targets, with sufficient granularity to identify areas which require adjustment to plans
- methodology for assessing performance against Passenger Charter commitments and on complaints handling
- consultation with passengers on how well the network is working
- passenger information improvements
- transparency and reporting of performance to passengers.

Conclusion

Transport Focus believes that the delivery plan will have a positive impact upon the Welsh Government targets for creating modal shift to more sustainable forms of transport. Key, however, is execution of the plan which will require rigorous monitoring to ensure things stay on track.

The closer that national strategy is aligned with passenger priorities the better the potential service for passengers and the more attractive for encouraging modal shift. In an era of cost consciousness and efficiency it will be essential that precious funds are spent on the things that we know rail and bus users value and want to see improve.

Transport Focus can add value through independent representation of transport users, holding to account for service delivery and challenging providers across all modes and across Wales. We stand ready to work with Welsh Government and Transport for Wales to assist in the delivery of the transport strategy, for the benefit of people across Wales.

¹⁷ [Transport Focus Publications Library](#) is available on our website.

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Appendix 1

Rail passengers' priorities

	Great Britain		England		Scotland		Wales	
	Rank	Index	Rank	Index	Rank	Index	Rank	Index
Reliability and punctuality	1	245	1	245	1	245	1	246
Price of train tickets offers better value for money	2	237	2	237	2	240	2	245
Passengers able to get a seat on the train	3	201	3	199	3	212	3	216
Trains sufficiently frequent at the times I wish to travel	4	164	4	165	4	162	4	164
Train company keeps passengers informed about delays	5	150	5	150	7	143	5	149
Inside of train is maintained and cleaned to a high standard	6	139	7	137	5	154	6	145
Accurate and timely information available at stations	7	138	6	139	8	133	7	139
Accurate and timely information provided on trains	8	130	8	131	9	124	9	131
Well-maintained, clean toilet facilities on every train	9	129	10	126	6	148	8	138
Less disruption due to engineering works	10	125	9	128	10	106	10	109
Connections with other train services are always good	11	103	12	103	11	103	11	104
Journey time is reduced	12	102	11	104	12	95	14	90
Good connections with other public transport at stations	13	91	13	91	14	92	13	90
Seating area on train is more comfortable	14	86	15	85	13	94	12	94
Easier to buy the right ticket	15	86	14	86	15	92	15	85
Improved personal security on the train	16	82	16	83	16	77	16	80
More room to stand comfortably on busy trains	17	75	17	76	19	64	17	76
Improved personal security at the station	18	70	18	71	20	64	20	66
Stations maintained and cleaned to a high standard	19	68	19	68	17	75	19	69
More environmentally friendly journeys	20	66	20	66	18	68	18	74
Easier to claim compensation when delayed	21	59	21	61	26	51	27	49
Free Wi-Fi available on the train	22	58	22	58	23	58	23	57
Sufficient space on train for passengers' luggage	23	57	23	57	22	60	21	62
Train staff have a positive, helpful attitude	24	56	24	55	21	63	22	59
Access from station entrance to boarding train is step-free	25	54	25	54	25	51	26	49
Station staff have a positive, helpful attitude	26	52	26	51	24	57	24	54
More staff available at stations to help passengers	27	48	27	48	28	47	28	47
More staff available on trains to help passengers	28	47	28	47	27	47	25	49
Better mobile phone signal on trains	29	42	29	43	29	39	29	34
Free Wi-Fi available at the station	30	36	30	37	30	33	30	31

Priorities for improving stations (%)



Rail passengers' priorities – by age

	All passengers		16-25		26-44		45-64		65+	
	Rank	Index	Rank	Index	Rank	Index	Rank	Index	Rank	Index
Reliability and punctuality	1	245	2	229	2	238	1	258	1	257
Price of train tickets offers better value for money	2	237	1	235	1	238	2	247	3	221
Passengers able to get a seat on the train	3	201	3	162	3	188	3	225	2	233
Trains sufficiently frequent at the times I wish to travel	4	164	5	150	4	168	4	175	7	154
Train company keeps passengers informed about delays	5	150	4	152	5	143	5	152	4	161
Inside of train is maintained and cleaned to a high standard	6	139	8	126	6	133	6	143	5	158
Accurate and timely information available at stations	7	138	6	139	7	132	7	140	8	150
Accurate and timely information provided on trains	8	130	7	135	9	127	9	130	9	134
Well-maintained, clean toilet facilities on every train	9	129	11	114	10	122	8	134	6	154
Less disruption due to engineering works	10	125	9	125	8	130	10	126	10	113
Connections with other train services are always good	11	103	12	102	12	102	11	104	11	103
Journey time is reduced	12	102	10	116	11	120	13	91	21	64
Good connections with other public transport at stations	13	91	14	93	13	93	15	90	14	88
Seating area on train is more comfortable	14	86	19	73	14	85	14	91	12	97
Easier to buy the right ticket	15	86	20	73	16	82	12	95	13	96
Improved personal security on the train	16	82	18	76	17	81	16	87	15	86
More room to stand comfortably on busy trains	17	75	15	90	15	83	18	67	25	52
Improved personal security at the station	18	70	22	67	19	70	17	72	18	70
Stations maintained and cleaned to a high standard	19	68	21	69	20	69	19	65	16	73
More environmentally friendly journeys	20	66	13	100	18	71	23	50	26	47
Easier to claim compensation when delayed	21	59	16	84	21	67	26	48	28	33
Free Wi-Fi available on the train	22	58	17	78	22	67	27	46	27	37
Sufficient space on train for passengers' luggage	23	57	23	64	24	53	22	53	19	68
Train staff have a positive, helpful attitude	24	56	27	49	26	51	20	59	17	71
Access from station entrance to boarding train is step-free	25	54	25	59	23	54	28	45	22	61
Station staff have a positive, helpful attitude	26	52	28	46	27	48	21	54	20	64
More staff available at stations to help passengers	27	48	29	41	28	46	25	49	23	57
More staff available on trains to help passengers	28	47	30	40	29	45	24	50	24	57
Better mobile phone signal on trains	29	42	24	60	25	51	29	31	29	22
Free Wi-Fi available at the station	30	36	26	53	30	44	30	25	30	19

Rail passengers' priorities – passengers with a disability

	Any disability		Mobility or wheelchair		Hearing		Eyesight	
	Rank	Index	Rank	Index	Rank	Index	Rank	Index
Reliability and punctuality	1	235	1	230	1	238	1	227
Price of train tickets offers better value for money	2	224	3	216	2	219	2	217
Passengers able to get a seat on the train	3	212	2	218	3	216	3	197
Trains sufficiently frequent at the times I wish to travel	5	145	5	142	7	139	4	145
Train company keeps passengers informed about delays	4	146	6	142	6	147	5	143
Inside of train is maintained and cleaned to a high standard	7	143	7	141	4	153	6	134
Accurate and timely information available at stations	8	132	8	129	8	134	8	131
Accurate and timely information provided on trains	9	121	9	116	9	122	9	119
Well-maintained, clean toilet facilities on every train	6	144	4	145	5	148	7	132
Less disruption due to engineering works	10	108	11	105	10	110	10	107
Connections with other train services are always good	11	100	12	100	14	96	11	97
Journey time is reduced	18	77	22	70	17	77	18	78
Good connections with other public transport at stations	14	90	15	91	15	85	14	87
Seating area on train is more comfortable	13	92	13	99	12	97	13	92
Easier to buy the right ticket	15	87	16	86	13	96	15	84
Improved personal security on the train	12	93	14	95	11	97	12	93
More room to stand comfortably on busy trains	25	64	26	57	25	58	25	69
Improved personal security at the station	17	79	17	81	16	82	17	80
Stations maintained and cleaned to a high standard	19	71	21	70	18	76	23	69
More environmentally friendly journeys	23	64	25	57	26	55	26	66
Easier to claim compensation when delayed	27	49	27	42	28	43	28	56
Free Wi-Fi available on the train	28	48	28	42	27	52	27	58
Sufficient space on train for passengers' luggage	26	63	24	60	20	69	19	77
Train staff have a positive, helpful attitude	20	69	20	75	19	71	20	74
Access from station entrance to boarding train is step-free	16	84	10	112	21	68	16	81
Station staff have a positive, helpful attitude	24	64	23	69	22	64	24	69
More staff available at stations to help passengers	22	67	18	78	24	61	21	70
More staff available on trains to help passengers	21	67	19	78	23	64	22	70
Better mobile phone signal on trains	29	35	29	29	29	36	29	42
Free Wi-Fi available at the station	30	29	30	26	30	29	30	36

Bus passengers' priorities for improvement

	Priority scores all age 20+	Rank all age 20+	Priority scores age 14-19	Rank age 14-19	Priority scores age 20-34	Rank age 20-34	Priority scores age 35-64	Rank age 35-64	Priority scores age 65+	Rank age 65+
Buses running more often than they do now	259	1	247	1	199	3	267	2	316	1
Buses going to more places you want them to	245	2	187	6	202	2	246	3	298	2
More buses arriving on time at your bus stop	237	3	217	3	204	1	236	4	283	3
Better value for money from bus journeys	215	4	197	5	191	4	273	1	97	11
More journeys on buses running to time	212	5	171	7	180	5	214	5	245	4
More effort made to tackle any anti-social behaviour	156	6	139	8	155	6	157	6	153	6
Faster journey times	142	7	215	4	154	7	152	7	101	9
More bus stops with next bus displays	112	8	86	11	105	9	100	8	154	5
Better quality information at bus stops	85	9	75	14	89	13	78	10	98	10
More space for wheelchairs and buggies	82	10	65	20	113	8	71	14	69	16
Drivers allowing more time for passengers to get to their seats	82	11	56	25	71	20	77	11	107	8
Cleaner and better maintained buses	80	12	90	10	89	12	76	12	78	14
More bus stops having shelters/seats	77	13	48	26	62	25	68	15	118	7
Being told of delays whilst on board	70	14	80	12	91	11	64	16	60	21
More tickets which allow travel on all local buses	70	15	66	17	75	18	82	9	33	27
More apps showing live arrival/running times	69	16	95	9	104	10	64	17	38	26
Free Wi-Fi more widely available	69	17	223	2	85	15	73	13	42	25
More comfortable seats	69	18	59	23	66	23	62	20	88	12
Improved ventilation and temperature control	68	19	65	21	79	17	63	19	68	17
Drivers showing more consideration for passengers	65	20	67	16	63	24	64	18	69	15
More audio-visual announcements of which stop is next	65	21	66	19	80	16	57	25	64	19
More personal space (whether seated or standing)	64	22	77	13	71	21	59	24	65	18
Better safety/security at bus stops	62	23	71	15	69	22	62	21	55	22
A smoother ride with less sudden braking or jolting	61	24	43	28	53	28	56	26	83	13
More buses accepting contactless/smartcard or mobile to pay fares	59	25	66	18	85	14	60	22	24	29
Improved route number/destinations shown on buses	57	26	61	22	74	19	54	27	46	23
A more suitable range of tickets for how and when you use buses	52	27	58	24	61	26	60	23	21	30
Making it easier to step onto and off of buses	49	28	34	29	54	27	43	28	61	20
Drivers communicating better with passengers	41	29	45	27	44	29	40	29	42	24
Better maintained bus stops	26	30	31	30	32	30	24	30	25	28

Non-user priorities – by age

	Priority scores all ages	Rank all ages	Priority scores age 14-19	Rank age 14-19	Priority scores age 20-34	Rank age 20-34	Priority scores age 35-64	Rank age 35-64	Priority scores age 65+	Rank age 65+
Buses going to more places people want them to	313	1	235	1	259	1	316	1	428	1
Buses running more often than they do now	212	2	174	3	196	3	216	3	249	3
Better value for money from bus journeys	209	3	197	2	227	2	225	2	159	4
Buses stops closer to home/destination	170	4	113	6	116	8	165	5	289	2
More bus services running on time	165	5	149	5	177	4	169	4	148	5
Faster journey times	151	6	157	4	171	5	158	6	106	6
More effort made to tackle anti-social behaviour on buses	121	7	113	7	130	6	123	7	106	7
Live bus times available on a smartphone	85	8	101	9	119	7	78	9	41	11
Buses running earlier/later in the day	81	9	77	11	85	9	86	8	65	8
Paying fares by mobile/contactless card	56	10	83	10	77	10	49	11	24	17
Easier to get info on bus routes and timetables	50	11	55	13	56	11	49	10	39	13
More comfort on buses	46	12	53	14	47	13	46	12	43	10
Cleaner buses	43	13	50	15	48	12	42	13	32	15
Drivers showing more consideration to passengers	40	14	49	17	39	15	39	14	40	12
Easier to get onto and off buses	39	15	41	18	34	16	37	15	50	9
Easier to get fares information	38	16	50	16	42	14	37	16	26	16
Special fares for teenagers	30	17	108	8	23	19	20	19	13	18
Bus companies getting more involved in the local area	27	18	36	19	25	18	23	17	32	14
More technology on board (Wi-Fi and charging)	26	19	59	12	30	17	21	18	10	19