

# MID WALES PARTNERSHIP

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## SUBMISSION ON THE POLICY REVIEW OF PUBLIC TRANSPORT

### **1. Overview:**

**1.1** Mid Wales Partnership (MWP) welcomes the consultation being undertaken by the National Assembly for Wales (NafW) and its establishment of policies that will strengthen the public transport service within Wales as part of a wider integrated transport system. In addition to the following response to the Assembly, the local authority partners within the Partnership are contributing to the perspective being supplied by the Welsh Local Government Association (WLGA) and the technical input being provided by the Association of Transport Co-ordination Officers (ATCO).

**1.2** The most pressing requirement to maintain the provision of a quality public transport network is continuity of funding. This is necessary to ensure adequate levels of investment from both the public and private purse and to reassure operators and the travelling public that services are here to stay. An integrated strategy for Wales, particularly for the more rural areas, must recognise that the private car will retain its major role. Nevertheless, public transport must be developed and a reliable, acceptable and affordable alternative means of travel will only succeed if, through continuity, it can engender sufficient faith in itself to allow a change of lifestyle. Dependability, and the perception of it, is paramount.

**1.3** Both the bus and rail services in Mid Wales will largely be uneconomic. Limited local funds have to be directed to ensure the retention of a viable, minimum transport network around which journey opportunities can be offered. The geography, sparse population and limited resources of areas such as Mid Wales place a premium on innovation and partnership working. A forward programme as envisaged through the Partnership's Integrated Transport Strategy and Local Transport Plans will provide an opportunity to achieve many of the goals set by the renewed interest in transport at national, regional and local levels.

**1.4** Local authorities have been given a variety of duties and powers. They will continue to be the best medium through which the NafW can provide improvements to public transport. The service appears to be best delivered through co-ordinated centres that procure public, education and community-based transport.

**1.5** Established groups such as the MWP can provide action on a regional basis and guidance to the

Assembly regarding high level and local policies. Similarly, NAFW itself will have a key role to play in determining policies and in funding and monitoring.

**1.6** The Partnership's Transport Working Group presented the "Mid Wales Integrated Transport Strategy" to the Assembly's Mid Wales Regional Committee on 7<sup>th</sup> April 2000 and this was further discussed at a meeting with the Transport Secretary on 7<sup>th</sup> August 2000. The strategy is annexed to the following summary paper to form the Partnership's response to the NAFW's Environment, Planning and Transport Committee.

## **2. Public Transport in Mid Wales:**

**2.1 The Network.** Rural areas such as Mid Wales often have a lower frequency of services, especially away from trunk routes. This may restrict journey opportunities but nevertheless, public transport is essential for those currently using it, necessary for those whose demand is presently suppressed and desirable for those who could use it and thereby reduce the region's dependence on car travel.

Longer distance road and rail transport provides access to and from the U.K networks and is a framework with which local services can connect. Whilst north-south routes are important there are equally major east-west links that must not be overlooked. The introduction of a regional or national coach network would be supported, subject to local consultation. It would require a regular, quality service working in conjunction with the National Express routes and offering through tickets and timetables with rail. Buses and coaches are reliant on a properly constructed and maintained strategic road system.

**2.2 Access Issues.** Public transport can reduce social exclusion providing vehicles are fully accessible ("super low floor") and matched to roadside infrastructure. Where there is little competition or non-commercial operation then, without additional funding, it is likely that fully accessible vehicles will only be introduced in line with the Disability Discrimination Act (DDA) timetable. Whilst train operators are now taking delivery of DDA compliant rolling stock but the programme for introducing buses and coaches could be somewhat longer with full compliance in service only by 2015/16.

Increased demand for accessible transport is producing commercial pressure for new vehicles. Finance, particularly for the smaller operator, will remain difficult and the possibility of reviving the New Bus Grant mechanism could be reviewed. Where residents are unable to travel to the bus or rail route, or to board a conventional vehicle, then alternative services such as community transport schemes are necessary.

**2.3 Regional Partnerships.** The regional bodies such as MWP provide a strategic framework within

which the public, private, community and voluntary sectors can work effectively, both collectively and in their own right. The Partnership's Integrated Transport Strategy seeks to address the needs of the region by meeting objectives in five key areas; the environment, economy, safety, accessibility and efficiency. It will achieve its goals through the delivery of an agreed programme that makes use of the current powers of County Councils and other agencies and through its other partners.

Nevertheless, there are a number of areas within public transport where current regulations and policies could be changed to deliver an improved service and these are commented on within service categories in the following sections. It is clear, for both the regions and Wales as a whole, that the establishment of specific transport bodies, offices or areas of operation with coincident boundaries would be beneficial. The commercial bus sector will be controlled via quality partnerships and contracts, and through the Traffic Commissioners. Although their office should be re-established in Wales an improvement in service, i.e. record systems and performance monitoring, is also needed, and not just relocation to Cardiff.

### **3.0 Buses:**

1. **Tendering.** The ability to organise small but socially necessary local bus services, and service amendments can be hampered by the tendering procedure. The question of reviewing current *de minimus* regulations has recently been addressed by the Association of Transport Co-ordination officers (ATCO) and MWP would subscribe to their report.

**3.2 Competition.** There is a case for the review of regulations that currently make through ticketing and joint company arrangements difficult. This will be important for further co-ordination, particularly across modes, and the Office of Fair Trading (OFT) definition of competition needs re-examining.

**3.3 Fuel Duty Rebate.** Continuation of the national Fuel Duty Rebate (FDR) scheme is essential to rural areas in light of increasing fuel prices and necessarily long route mileage. Alternative support mechanisms have been considered but could have a considerable effect on the current transport network and the requirement for financial support. The present FDR system is simple to deliver and monitor and its review, though required, should adopt a cautious approach.

The opportunity to allow certain CT schemes to reclaim FDR should be considered (see also 5.3). Currently, flexibly routed transport services may find it difficult to qualify. Flexibility is desirable providing that monitoring by the Traffic Commissioners is improved. The requirement to have seats available to the public has not been a problem on school routes open to the public.

**3.4 Concessions.** Considerable change to concessionary travel schemes is underway nationally. The

NAfW is playing a pivotal role in this respect and further work by the Concessionary Travel Steering Group is anticipated. There are a number of outstanding issues to resolve; including the extension of concessions to community-based transport and taxi services and the potential impact schemes may have on rail journeys. A national concession scheme is needed, perhaps Cerdyn Cymru, as there is a target for the scheme to be fully interavailable by April 2002.

### **3.5 Information.**

Great improvements are being made to the supply of public transport information and again, the NAfW has led in promoting this change. The PTI Cymru partnership between local authorities and the commercial sector should receive continued support to ensure a quality all-Wales system. Telephone callers should only be charged the local rate. There is a need to add local information e.g. about the CT and taxi sectors, to ensure a truly comprehensive service is offered.

**3.6 Funding.** Continuity of funding is the single most important requirement for public transport. Operators, including community transport schemes, require security for meaningful investment and passengers (and potential passengers) also need that security. The NAfW has recognised the necessity of proper funding for travel concessions and has set up a partnership group to consider the future of the Rural Bus Grant (RBG). This should be a priority, as a revenue budget is needed to maintain the previous investment, particularly for assets such as shelters.

## **4.0 Rail:**

**4.1 Franchising.** The extent of the proposed all-Wales operational area for rail services has now been confirmed and eight pre-qualifying bidders have been identified. Details of the new franchise specification will be resolved before a final round of bidding and a new operator is expected to be in place by the end of 2001.

- 2. Service Specification.** The Partnership's main concern must be that, whatever the operating territory and whoever the train operator, a proper rail service is supplied for the benefit of residents and tourists. The frequency and quality of this service must be such that it encourages growth in passengers and makes a proper contribution to the public transport network and the economy of the region. New rail franchises could be in place for up to twenty years and, notwithstanding the proposal to hold periodic reviews, it is essential that a proper base is established on which further improvements can be built. Appropriate representation concerning service specification has been made through a number of rail groups without satisfactory conclusion.

**4.3 Rail Administration.** The NAfW will be expected to co-ordinate regional rail policies, to promote rail development and to provide a central point for liaison with Railtrack. It must establish a positive

role in relation to the Strategic Rail Authority (SRA) and monitor remind the proper treatment of railways as part of an integrated transport network.

The advantages of the SRA having a Wales directorate should be considered. Similarly, an all Wales Railtrack organization may be some years away, and perhaps an existing service zone should take the lead for now as this could be achieved without legislation. Would both operations necessarily be in Cardiff?

**4.4 Freight.** The Freight Facilities Grant is for modal switch from road to rail. This discourages rail-based development and new traffic should also be able to take advantage of the grant.

## **5. Community Transport:**

**5.1 Organization.** There is a notable shift in emphasis towards community-based transport (CT). A corresponding increase in funding is needed together with a review of the constraints that stop CT from playing a greater role in the provision of public transport. The NAFW supports a Wales CT Development Officer to help implement national policy and to work with areas such as Mid Wales. The MWP's proposals for CT are contained in its Integrated Transport Strategy and some further aspects have been covered within Section 3 above.

**5.2 Delivering Funding.** Two items are of special note:-

The Wales Rural Transport Grant (WRTG) is not being delivered in full and only £100 of the £250,000 available for 1999/2000 was taken up. There is a need for these funds but no CT structure to support and encourage transport schemes to apply. Funding is managed differently both within Wales and elsewhere in the UK; Assembly funding of some £700,000 p.a. for environmental projects and £600,000 p.a. for the promotion of volunteering is successfully administered through Environment Wales and the Wales Council for Voluntary Action (WCVA) respectively. Both bodies actively promote the grants, employ development officers to assist applicants and expert grant committees to determine applications. The Scottish Rural Transport Fund of £600,000 p.a. is also governed by an independent grants committee. It would seem appropriate to review the WRTG with the aim of adopting current best practice.

Legislation is necessary to make it easier for the voluntary sector to operate buses, perhaps via taxi licensing or S.22 permits. The possibility of paying drivers working under S.22 permits must also be tackled, with suitable protection for commercial operators.

**5.3 Funding Restrictions.** As small scale, community based transport is recognised as an effective way of meeting rural transport needs, consideration should be given to allowing Local Authorities to use RBG funds for both commercial bus and CT projects. If there is to be an integrated transport system, a more integrated approach to funding should be achieved.

The opportunity to allow FDR claims from CT schemes should be examined. "Section 22" minibus permits allow voluntary groups to provide scheduled community bus services, though this option has not been taken up to any extent. In addition to a general review of such operations, consideration should be given to allowing payments to be made to drivers.

**5.4 Future Structure.** For the longer term, consideration needs to be given to developing a CT structure at county and unitary authority level throughout Wales. In Wales very few local authorities employ full time CT officers and a network of CT development officers could be considered, together with appropriate direction at regional and national level.

## **6. Other Modes:**

**6.1 Taxis.** Private hire and hackney vehicles form an essential part of the public transport network and are the only transport available in many areas, especially in the evening. Taxi operators can also supply minibus services and may be employed by both the health sector (e.g. hospital car contracts) and CT groups (taxicard schemes). Whilst the licensing of taxis should remain with Local Authorities, a review of the role of taxis within public transport is long overdue. Areas of interest for the future will include the sector's compliance with the DDA and its acceptance into concessionary travel schemes.

**6.2 Full Co-ordination.** Notwithstanding the strenuous efforts that have been made to better co-ordinate local buses and education services there is an inescapable move towards establishing separate fleets. This is particularly so in rural areas where smaller capacity vehicles may be required for local services and higher volume vehicles (with seat belts) are necessary for school journeys. Operators running touring coaches (with high seats, toilets etc.) have established a "third fleet" which is unsuitable for other uses.

There is, however, growth in contracts that require special medical care and equipment. Whilst this alters vehicle fleets and adds to unit costs, there is increasing conformity between sectors that provide accessible vehicles for local transport, special educational needs and welfare use. Health sector transport could play a greater part in the public network, as could social services resources, but they are frequently overlooked despite the fact that they place great demands on the system.

The provision of transport for education purposes accounts for most rural expenditure on bus services. This funding has a considerable influence on the nature and location of operators and vehicles, particularly at peak times. There is a need for further training amongst education staff, including school governors, and there are programmes to promote safer routes to schools and green travel plans.

## **7. The Regions & the National Assembly:**

**7.1 Regions.** Members of the Partnership will have submitted examples of good practice in Mid Wales as evidence to the Assembly and these will show partnership, innovation and service quality. Proposals for a Public Transport Authority (PTA) may have raised regional support in the past but are unlikely to do so now. It is noted that the WLGA have disproved the viability of the concept at some length, demonstrating that the local authorities are best placed to provide a transport service within a regional framework.

**7.2 Leadership.** Whilst groups such as MWP take up the leadership of regional transport policies, this should be on the basis of continued partnership and does not require regulation. The NAFW should lead a national policy, informing public and professional opinion. It should make use of powers in relation to quality contracts, partnerships and franchises and its grants and can ensure that the planning process and policies within regions such as Mid Wales are properly implemented as part of a national, integrated public transport strategy.

**7.3 Points for Action.** Some of the main issues that require attention by the NAFW are:-

**Funding.** The need for greater and consistent funding must be addressed. This applies equally to public transport and to highway maintenance. The benefits gained from the RBG and other grants must be maintained. Consideration should be given to hypothecated revenue grant, the MWP would support ringfenced or targeted finance to achieve specific transport aims. [see 1.2, 3.6]

**LTP.** Local Transport Plans should be regulatory but not inflexible. The regional dimension can be accommodated by proper co-ordination such as through the MWP. Two development control issues require action; Traffic Impact Assessments should become Transportation Impact Assessments, and an update of PPG Wales is needed, and TAN18, at an appropriate time. [see 1.3]

**Longer-distance Routes.** The Assembly should lead a national rail development strategy. It must ensure that service specifications for the all-Wales rail franchise meet future needs and are not dictated by the PSR standards set at privatisation. Through its relationship with the SRA, the NAFW should promote improved services across Wales and consider limited support for the development of a linked national coach network. [see 2.1, 4.1 - 4.4,]

**Access to Services.** The NAFW should be proactive in promoting implementation of the Disability Discrimination Act and general accessibility issues for public transport in Wales. The role of CT should be developed as part of the wider transport network. [see 2.2, 5.4]

**Traffic Commissioner.** There remains a need for the Traffic Commissioner to have a direct presence in Wales. [see 2.3]

**Co-ordination.** The continued application of the 1985 Transport Act (and subsequent regulations) in its entirety is being questioned. Measures designed to ensure competition are inhibiting co-ordination. The recent ATCO report on *de minimis* tendering limits should be adopted and obstacles to through ticketing

require examination. [see 3.1, 3.2]

**FDR.** Any review of the Fuel Duty Rebate system should give careful consideration to the benefit it could have to the CT sector and the effect that any changes may have on rural services. [see 3.8]

**Information.** Travel information will play an important part in the future growth of public transport. The NAFW should maintain its lead and further develop current initiatives. [see 3.9]

**Concessions.** Resources need to be put in place to ensure the continued development of a Wales Concessionary Travel Scheme and to keep it ahead of provision elsewhere in the UK. [see 3.10]

**WRTG.** The Welsh Rural Transport Grant should be marketed more aggressively and a review of the position and strategy behind this and other transport grants would be appropriate. [see 5.3]

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