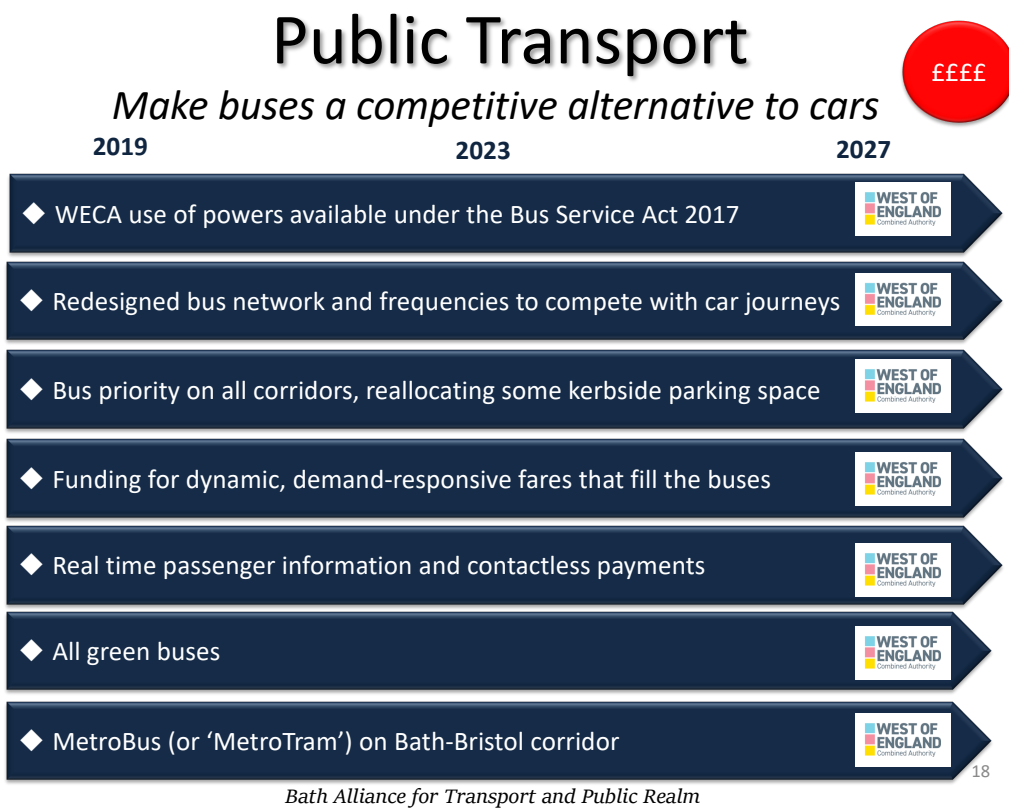


Comments from [Bath Alliance for Transport and Public Realm](#) on:

**West of England Bus Strategy
Consultation Document
February 2020**

The Consultation Document is a well-prepared, coherent discussion note on the Bus Strategy that supports the JLTP4 with a vision, explicit objectives and strategic themes for bus services in the region. It actually follows most of the recommendations of the Public Transport component of the Manifesto of the Bath Alliance for Transport and Public Realm, below:



This note from the Alliance offers comments on the Consultation Document, recommends changes to some of its proposals and suggests further detail for consideration of certain aspects.

Vision and Objectives

A shorter vision that sharply focuses on the central mission of significantly shifting transport movements from cars to public transport would have more impact:

A bus service genuinely competitive with cars to make public transport the preferred mode for most journeys that are unsuitable for walking or cycling.

The list of objectives could be shortened to two, as several of those noted, however valid, are actually means towards the broader aims and cannot easily be measured:

- Double bus passenger numbers by 2036
- Mobility for people without access to a car

Operating Model

Although addressed at the end of the Consultation Document, the *choice* of operating model lies at the core of the Bus Strategy and profoundly affects WECA's ability successfully to implement it. WECA has significant statutory powers that allow it to choose from several bus operating models, ranging from the existing deregulated private operator model to a fully franchised 'London' model. Several operator 'partnership' models lie between the two extremes.

The Consultation Document considers these alternatives but appears implicitly to dismiss the franchise model as bringing higher costs than others. It is not possible to select the best operating model (i.e. the one most likely to meet the objectives at lowest cost) without a rigorous assessment that takes into account not only the allocation of commercial risk and reward between WECA and bus operators but also the essential elements of the bus system that must be *centrally* controlled if it is to meet its objectives. These essential elements include network design, infrastructure, pricing/fares, equipment, information and payment. These elements are defined and discussed more fully below.

Franchising would give WECA control over all of these elements to ensure that the bus system is run wholly in the public interest. But franchising brings revenue risk to WECA as well as responsibility for network design, pricing/fares management and the administrative cost of operator contracting. Partnership models could enable central control over all the essential elements except for network design and pricing/fares. It is conceivable, however, that WECA could develop a partnership operating subsidy scheme that provides for competitive tenders for packages of routes from a WECA-designed network with a quasi-flexible fares structure that shares revenue risks and rewards with bus operators. Untendered route packages in the network could be franchised. Understandably, bus operators generally oppose franchising, which they feel could restrict the scope for developing their businesses.

It is important to note that the operating subsidy required to meet the Bus Strategy objectives would likely be the same under both operating models. With franchising the subsidy is the WECA operating deficit; with partnerships the subsidy is paid to the bus operators.

Network

The bus network is the collective set of routes and frequencies that make up the system. Currently the observed 'network' was never 'designed' and is actually the individual routes that have accumulated over time based on commercial viability for the bus operators (Some routes are subsidised by councils). A bus network designed to achieve the Bus Strategy objective of achieving modal shift away from cars would quite likely look different from the existing collection of routes and frequencies. At the heart of the Bus Strategy should be a fresh WECA design of an integrated network that provides bus services that compete successfully with car journeys that occur now and in future.

The new network would likely incorporate the principles set out in the Consultation Document: track the most heavily used car corridors, provide both cross-city and orbital services, facilitate coordinated interchanges at multiple hubs such as Park & Ride sites, offer appropriately high frequencies and provide ad hoc on-demand mobility in low-density areas.

Infrastructure and Bus Priority

Under all operating model alternatives WECA should take responsibility for designing and funding the bus infrastructure, all designed to support the new network and to guarantee absolute bus priority on all relevant corridors. Bus priority addresses one of the most significant current constraints on making buses competitive with cars. Reallocation of kerbside space from parking to bus (and cycle) lanes will be a necessary policy initiative supporting giving buses top priority.

As suggested in the Consultation Document, bus competitiveness is also enhanced by the passenger experience at bus stops. Comfortable and attractive stops and shelters play a significant role in drawing passengers used to their comfortable, convenient cars.

Pricing and Fares

The most challenging reality of public transport is that it inherently requires operating subsidies to allow fare levels that are competitive with driving cars. However, intelligent pricing and fare strategies can be a powerful way to minimise the public subsidy needed for an effective bus system.

Other transport sectors, notably airlines, have demonstrated that fare strategies exploiting the inherent 'elasticity' of demand (i.e. the impact on passenger volume caused by each incremental change in price) can significantly increase revenues. Furthermore, airlines have developed 'dynamic, demand-responsive' fare management systems to optimise the revenue for each flight. Bus services are quite different from airlines but the same basic principle of demand elasticity inherently applies to bus fares. Fixed bus fares are not optimal. Lower fares will increase off-peak passenger volumes, potentially enough to compensate. Peak demand fare increases will reduce passenger volumes but possibly not very much. A better understanding of bus fare elasticity is needed. Perhaps WECA could join with other combined authorities to sponsor valuable research on this question.

The simple criterion for bus fare levels at any time should be always to keep the buses full. The operating subsidy level required for low fares and full buses may not be significantly higher than for higher fares and near-empty buses. Apart from a well-designed network and bus priority, lower fares are the most powerful way to make buses competitive with car travel.

Equipment

The Consultation Document correctly contemplates quickly moving towards 'green' buses that minimise air pollution and carbon emissions. Indeed, the CAZs in Bristol and Bath and likely Climate Emergency responses in both cities are already providing momentum to modernise the fleet. In future, WECA will be in a position to specify equipment under any of the operating models it selects.

Although driver salaries dominate bus operating costs there is value in optimising the size of buses for each route. Larger buses have lower unit costs but oversized equipment with empty seats add unnecessary cost, emissions and congestion. Smaller buses are easier to fill, have lower emissions and create less congestion but have higher unit costs and if undersized can create overcrowding and passenger dissatisfaction.

Payment

The Consultation Document list of principles underlying payment for bus travel are good. The most important aspects of the payment system are a simple, transparent fare structure and contactless technology.

Information

Buses cannot compete with cars without a sophisticated passenger information system. The principles underlying the proposed Bus Information Strategy are excellent. Technology is a friend in enabling such an information system to be delivered.

An app-based 'transport as a service' platform incorporating all modes (e.g. *Citymapper*) would boost bus competitiveness with car travel with instant all-mode comparisons of cost, travel time and frequency.

Funding

The Consultation Document needs to address bus system funding in more depth. WECA's funding powers may be able to deal with bus infrastructure capital expenditure needs but it cannot easily provide the operating subsidy that is essential to achieve the objectives of the Bus Strategy. Indeed, there is a question of whether a large expenditure on bus

infrastructure is actually warranted unless fare levels can be low enough to move a significant number of car drivers to buses.

Notwithstanding recent indications of new funding for local buses it should be assumed that central government will not be a source of significant bus operating subsidy other than for the existing concessionary fares scheme and for the Bus Services Operators Grant. WECA and the WoE Unitary Authorities should prioritise the development of new funding sources for operational support of the new bus system. These sources could include:

- Road User Charging (RUC): Already contemplated in the JLTP4 and in the Consultation Document, RUC can be a powerful revenue generator for the bus operating subsidy. It follows naturally from the already developed CAZs in Bristol and Bath, could eventually subsume them and would also provide added incentive for drivers to switch to buses. A detailed plan for a new RUC for London to replace the Congestion Charge and the ULEZ Charge has already been developed and may be proposed in some of the London May 2020 mayoral election manifestos. This RUC proposal was designed for use also by the other mayoral combined authorities, including WECA.
- Parking Charges: There is significant scope for the WoE Unitary Authorities to increase parking revenues with new parking strategies, themselves designed to reduce the intrusion of cars in the urban centres. Central to these plans would be to create effective pricing differentials between Park & Rides and parking in centres, reducing both on street (permitting reallocation to bike and bus lanes) and off street (releasing valuable land for housing or other development) parking capacity, reviewing residents parking fees and creating controlled parking zones across the whole of the cities of Bristol and Bath. Workplace parking levies, also mentioned in the JLTP4 and the Consultation Document, could be included in these new parking plans. Parking revenue can legitimately be used to subsidise the WoE bus system.

Bath Alliance for Transport and Public Realm

The *Alliance* is twenty-one Bath organisations joined informally to provide a unified voice for the majority of Bath stakeholders with vital shared interests in excellent transport and public realm. It has come together to support B&NES Council's transport effort in Bath and to urge the council to develop and deliver a comprehensive, long term transport plan for the city. The *Alliance* does not campaign for individual transport initiatives but it does offer guidance on the framework for a plan through its [Manifesto](#).

The *Alliance* members are:

Aviva Investors | Bath BID | Bath Bridge | Bath City Football Club | Bath Festival | Bath Preservation Trust | Bath Spa University | Bath Rugby | British Land | Curo | Cycle Bath | First West of England | FoBRA | Kaleidoscope Collection | NHS B&NES CCG | NHS RUH | Stay in Bath | Sustrans | SU Bath | University of Bath | Wessex Water