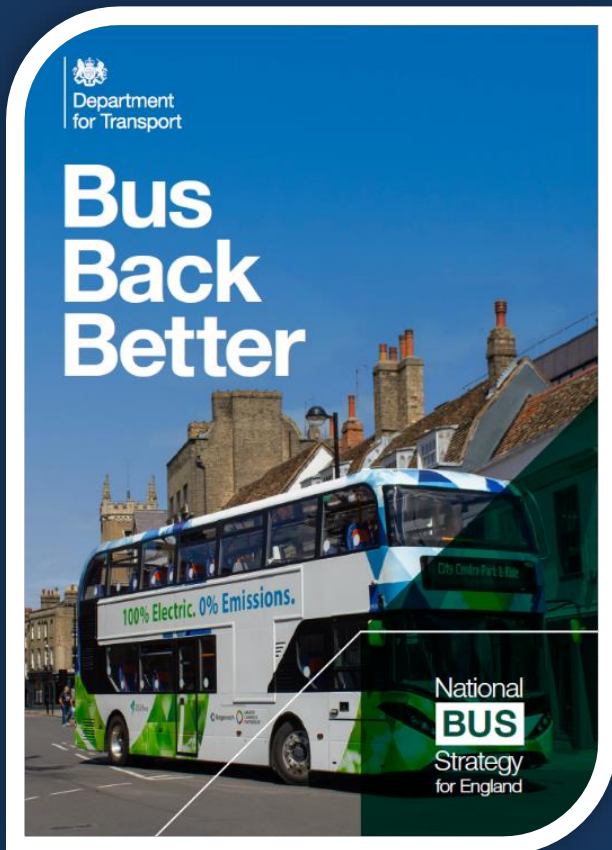


# Bus Back Better

## National Bus Strategy – March 2021



DfT published its long-awaited National Bus Strategy (NBS) document on 15 March. Here is a synopsis and comment from TAS on its content and provisions. The strategy is interesting in that there is 'meat' throughout its 84 pages and a simple executive summary is inadequate. Even the seven-page Covid Recovery Appendix contains significant and important material, not least relating to concessionary reimbursement. In essence, the document is less strategy and more White Paper!

There are three main strands to the strategy's intention:



In order to address emissions levels and arrest the ongoing decline in bus patronage, there is a need to 'do something' - the 'do nothing' alternative being leaving commercial centres to be strangled by ever-growing traffic congestion while bus business continues its decline. The government acknowledges that, of all public transport modes, buses are most adaptable and change can happen quickly – in 'months'.



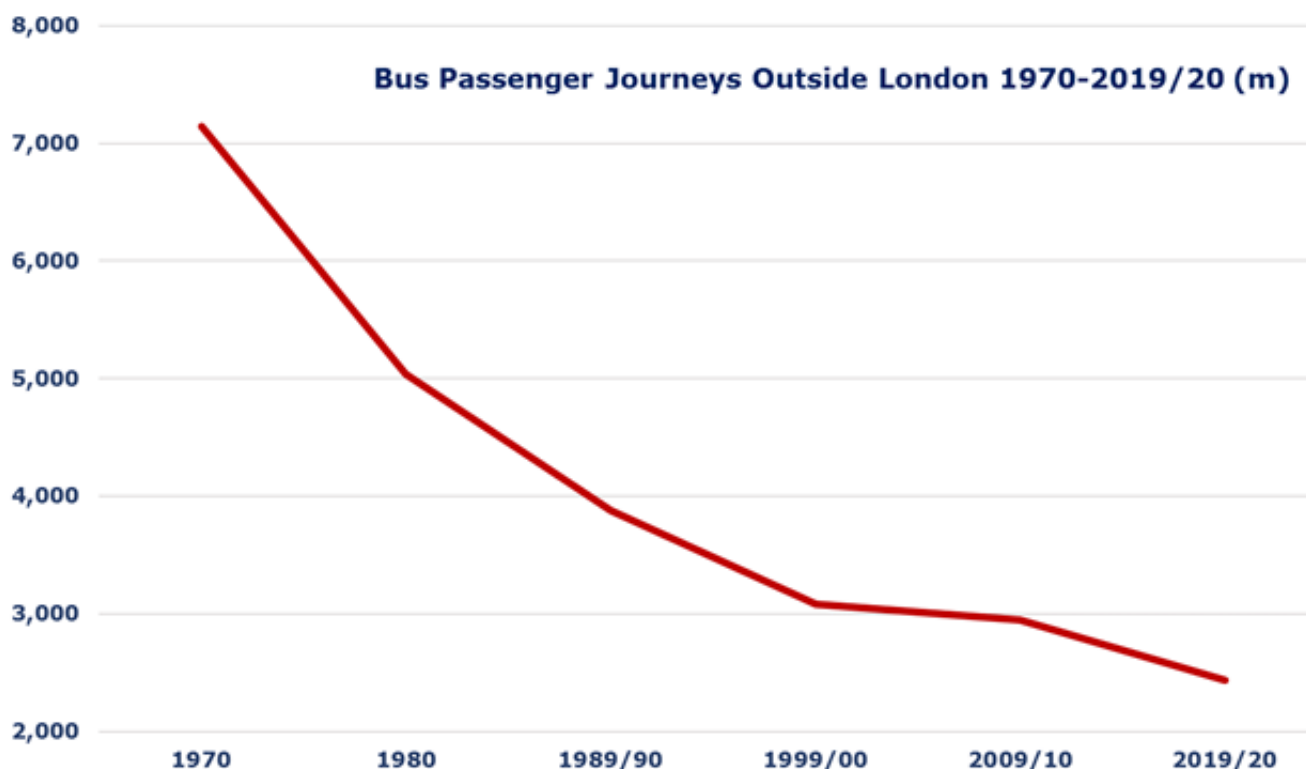
An undercurrent that, despite legislation allowing other service delivery models and facilitating such as multi-operator tickets, action on the ground has been 'sparse'. The net result is central government saying 'right, this is the way it's going to be'.



A suggestion that improvements to buses outside London are seen as part of the 'levelling up' agenda with the aim of offering 'London-style' services across the country but for once there is also an acknowledgement that London is not the bus Utopia some paint it to be.

## For Immediate Attention

- ◇ To continue to receive **CBSSG**, all operators and LTAs in England must formally agree to developing an Enhanced Partnership (EP) by 30th June 2021, with the Bus Improvement Plan agreed by October 2021 and the EP starting by April 2022
- ◇ There is still no set date for returning to **Concessionary Fares** payments related to actual patronage, LTAs are expected to continue the current arrangement even after social-distancing is relaxed and DfT is preparing a Statutory Instrument to make this obligatory.



Bus Passenger journeys in Decline  
(figures include Scotland & Wales – data not separated until 1982)

## 'To Do' List

With a clear emphasis on Enhanced Partnerships, with 'new guidance over the coming weeks', there is a lot to do for everyone in the industry, but the activity focus is very definitely on local transport authorities (LTAs) and even more so the DfT itself. We can interpret a 'to do' list as a series of jobs:

### Jobs for all Local Transport Authorities

#### Timetable

- **June 2021** – commit to establishing Enhanced Partnerships (EP) across their entire areas under the Bus Services Act.
- **October 2021** – publish a local Bus Service Improvement Plan (BSIP), detailing how they propose to use their powers to improve services. BSIPs must include fares policies.
- **April 2022** – EPs must be up and running. EPs are expected to be produced jointly where 'local economies and travel to work areas overlap significantly' or where an area hopes to become a Mayoral Combined Authority (MCA).
  - MCAs must develop a Key Route Network;

#### Local Transport Authorities will

- Have new powers to enforce traffic regulations.
- Be expected to promote bus reliability and to implement ambitious bus priority schemes in order to receive new funding.
- Continue to make ENCTS payments at pre-COVID levels.

### Jobs for Department for Transport

- Publish updated guidance on Enhanced Partnerships 'in the coming weeks'.
- Publish detailed guidance on preparing a Bus Service Improvement Plan.
- Publish updated statutory traffic management guidance promoting bus reliability as part of highway authorities' Network Management Duty.
- Consult 'shortly' on increasing MCAs' powers over key roads in their areas. And on strengthening the Key Route Network approach.
- Issue new guidance on the meaning and role of 'socially necessary' services.
- Consult on reforming BSOG in 2022 to promote the new strategy and move away from fossil fuel subsidy.
- Establish England's first Bus Centre of Excellence (BCoE), enabling the delivery of a long-term programme of activities and support.
- Review whether to allow new municipal bus companies to be established.
- Progress the Future of Transport Regulatory Review.
- Finalise Accessible Information Regulations by summer 2022.

- Review the impact of roadside infrastructure and develop understanding of impact on passengers and bus usage.
- Review eligibility for free bus travel for disabled people to ensure an improvement of equality.
- Review of the Public Service Vehicle Registration Regulations
- Review PSVAR arrangements by the end of 2023
- Consult on the appropriate standards and mechanisms by which consumer expectations can be enforced and determine the appropriate body to supervise them.
- Publish the high-level training framework to drive up standards of customer service.
- Consider expanding the Rural Mobility Fund to include piloting non-rural services.
- Launch the Zero Emission Bus Regional Area (ZEBRA) scheme.
- Introduce a Statutory Instrument to legalise paying ENCTS reimbursement at pre-COVID levels; review appeals process, reimbursement guidance and reimbursement calculator, following the impact of COVID-19.

### Jobs for Operators

- **June 2021** - to co-operate with all LTAs throughout the process of setting up EPs – otherwise they will lose government funds.
- Participate this year in an industry led 'Back to Bus' campaign to promote the reformed network and address misconceptions, encouraging bus use.

## Points and Principles

The government spells out what it wants from bus services on pages 30 and 32 of Chapter 2, but at the same time is short on definition. For example, how frequent is a 'turn up and go' service, or how 'low' is a low fare?

### Fares and Ticketing

- Within cities and towns, there should be low flat fares, then lower, simpler distance-based fares for 'other journeys' and more low daily price capping.
- Bus Service Improvement Plans to consider youth fares;
- Multi-operator ticketing should be available everywhere, covering all bus services at a price little if at all higher than single-operator tickets, then 'in time' to extend this to tickets that cover all travel modes (bus, light rail, metro and rail);
- Plusbus should be available in e-ticket form;
- Smartcard usage will decline as contactless uptake rises so there is little point in attempting to make different smartcard systems compatible;
- Jobcentre Plus Travel Discount card to be universally accepted, and eligibility widened.

### Service Provision

- Key urban corridors should have a 'turn up and go' service level, provided by a single service rather than multiple lower frequency services.
- Evening and Sunday services on these corridors should be at least every 15 minutes.
- There should be no 'over-provision' caused by head to head competition.
- A common bus route numbering system in each area which avoids multiple services using the same number in the same place.
- Up to date timetables and network maps should be provided at bus stops and online.
- Bus Priority should be on a whole corridor approach with multiple measures.

### Delivery Modes

- There are only two available delivery models on offer, an Enhanced Partnership (EP) and franchising. However, any LTA which wishes to pursue franchising but has not already started the legal process for franchising MUST implement an EP in the meantime. *[It is difficult to see any LTA wishing to pursue both processes simultaneously. This, of course, leaves Manchester alone to progress its franchise proposal. Its last plan, showing fare rises above inflation, service reductions and continuing passenger decline, now seems to sit at odds with the new strategy.]*
- The classic 'Catch 22' is that the funds available are mostly delivered through proposals detailed in the Bus Service Improvement Plans (BSIP) but then the funds allocated will depend on the quality of the content of the BSIP....

### Finance

The Government committed £3bn to buses in February 2020. Some of this has already been earmarked for 'Rural Mobility Fund', 'Electric Bus Towns' and an amount to cover increased subsidy payments to improve or reinstate services. Then, of course, along came Covid-19. It is unclear how much of the Covid support will come out of the £3bn but it is clear that ongoing support will. Covid support is promised for 'as long as it is needed' which is anticipated to be several years. The bulk of the funding is expected to be committed from April 2022. However, within this financial year:

- £300m is set aside to assist recovery from the pandemic;
  - with strings attached as detailed on p.80 in the COVID-recovery Appendix.
- £25m is earmarked to 'give LTAs the skills and people they need to deliver the strategy' – including the setting up of a Bus Centre of Excellence with an emphasis on training;
- £120m is dedicated to accelerate the delivery of zero-emission buses;
- £1.5m in 2021/22 for small bus operators for improved on-bus information and
- The first bus priority schemes will be implemented.

The build up to the NBS includes talk of BSOG reform. This has however been delayed, with a consultation promised later this year. This therefore creates yet further uncertainty around longer term funding.

## Other Aims and Ideas

- Improve information supply and the accuracy of journey planners;
- Emphasis on bus lanes and bus priority measures;
- Superbus networks for 'intermediate' areas in areas with patchworks of small industrial towns [Cornwall is quoted as the template];
- Better services provided to places of employment off existing main bus routes, such as out-of-town industrial estates and factories, possibly with integrated demand responsive transport geared to shift times. 'There is a role to play for employers in helping with this';
- Support new forms of provision, such as demand responsive travel in smaller vehicles in lower-density, often rural, areas NOT served by conventional buses;
- Railway stations should be hubs for connecting services with high quality stops close to station entrances. Development schemes that move buses further away from stations should not be allowed;
- More bus services should carry bikes – both rural and urban;
- Apps should provide accessibility data about bus stations and stops;
- Buses funded by Government must provide an enhanced level of accessibility: including additional flexible space for a second wheelchair user or passengers with pushchairs;
- Bus services will be included in rail journey planners;
- Coordinated timetable change dates;
- Development of local network branding while acknowledging the benefit of route branding;
- More use of feeder buses to allow faster core networks;
- Universal passenger charters, with local redress;
- DRT can 'tackle the bugbear of hospital car parking';
- An ambition to see the development of proposals for up to five (Belfast) Glider-style systems in England's towns and cities. DfT believes BRT can deliver a large proportion of the benefits of rail-based schemes at much lower cost;
- Create at least one zero-emission city.



## Comment, Deficiencies and Unanswered Questions

TAS has concerns that some of the 'vision' content reflects an over-optimistic assessment of what is possible, particularly where the availability of support finance continues to obligate a mainly commercial proposition. With a very long wish list, all of which costs money, what at first seems to be a very large sum of money could quickly turn into jam spread too thinly. At worst, entire areas could find funding derived from who can write the best Bus Improvement Plan, like an over-stretched challenge fund. In 2018, the West Midlands Sprint BRT was costed at £110m, over £200m for the Cambridge Busway, £100m for the Belfast 'Glider'. Implementing five such schemes puts a very large hole in £3bn. Of course, to this will be added many highway schemes where anything that involves moving utilities ratchets up the pounds.

The requirements placed on the Enhanced Partnerships will require LTAs to provide much more financial support than hitherto. Paying for extra services is a given, but the strategy is silent on making up the shortfall in revenue resulting from the desired decreases in fares. Spending public money to subsidise low fares throws up issues of distortion of competition and State Aid (now Subsidy Control). The DfT seems to wish to achieve a degree of coordination and collaboration which is anathema to the competition authorities, yet the strategy again lacks any reference to relaxation of competition law.

Flat fares are indeed simple, but strict application risks losing revenue as short distance passengers are priced off the network and longer distance passengers no longer cover their costs. Almost every 'flat fare' scheme in operation has had to introduce a 'short-hop' fare and exclude certain services which use distance-based fares. There is emphasis too on daily capping, surely an over-complex solution with significant back-office costs compared to the norm of having a simple day ticket?

We would never disagree with the principle of simple high frequency services, but years of experience and previous attempts at doing so shows that whether there is a through fare or not, people do not like being forced to change from a feeder to a main service on a simple urban journey and this leads to patronage loss rather than growth.

There are references to 'turn up and go' frequencies, buses 'every few minutes' and indeed to 'over-provision'. None of these have any definition. And how few do those minutes need to be to turn into over-provision? Who decides what constitutes over-provision? Similarly with 'areas that are under-provided'. By whose measure, using what criteria?

Likewise, the focus on app-based DRT as the solution to the rural transport issue is concerning. Whilst these services do play their part there is a whole suite of options that should be available. There is only so much service that a given DRT resource can provide and many, even in rural areas, prefer a limited timetabled (but predictable) service.

## **Comment, Deficiencies and Unanswered Questions (cont.)**

Community Transport (CT) organisations have for years been providing essential services to rural and urban areas which aren't viable from a commercial prospect, however there is little mention of CT operations within the strategy. Neither is there a strategy for school services which not only act as a shop window to children and young people, but also allow provision of marginal public services through shared resources. If one of the main objectives is modal shift, tackling the school run should be a priority.

You will find no objection here to multi-operator ticketing, but why our light rail systems are excluded is a puzzle. These are not the same as the national network, being locally-focussed, so why should anything on rails sit in an island on its own?

Administratively, under an EP, responsibility for bus service registrations switches to the local authority. We can't help but feel this is a retrograde step, almost a return to the 1920s where buses carried multiple licence plates allowing operation in different council areas. There is benefit in the Traffic Commissioner retaining this role centrally.

We are also fully supportive of improved promotion and information, but although the strategy acknowledges the importance of printed information being available at bus stops and that bus maps should be widely available, there is no acknowledgement of the desirability of printed timetables and distribution points. Reliance on apps and journey planners is inadequate if there is a desire to promote the 'network'.

Funding for zero-emission buses is again welcome, although again, four thousand of them at (say) £100k per bus uses another sizeable chunk of the funds. But in the Covid era, a condition of CBSSG is that operators make no profit. It is this profit that funds new vehicles. If there is no cash for new vehicles at the outset, top-up funding to make them zero emission is pointless. Maybe the solution is for DfT to purchase vehicles outright and lease them to operators?

Different interpretations of guidance could cause disagreement. With service numbers, we can see why it is unwise to have two services numbered '1' in, say, Penzance, but that is not to say there should not be two services numbered '1' in the whole of Cornwall. Similarly, with a brand for an area – an 'area' could be interpreted as a town, but there will be those arguing for an entire county's buses to be an amorphous grey. And whose brand will predominate on a cross-boundary service?

Finally, the whole document has a very urban bias, with some reference to very rural areas. Solutions for dense urban areas are all well and good, but a huge proportion of services serves other markets, not least the interurban network which often crosses multiple LTA boundaries driven by where people want to go. These areas merit a quarter page in the strategy, with a poorly-defined reference to 'Superbus'. In the world of the Enhanced Partnership (let alone a franchise) who looks after our interurban services?

## How TAS Can Help

The immediate priority is to ensure that the Enhanced Partnership deadlines are met.

TAS researched and developed detailed guidance on Enhanced Partnerships for the DfT prior to the Bus Services Act.

We are thus in a very strong position to support local authorities and operators to develop and deliver the necessary Partnership agreements.

This can be as general support, as third-party intermediary or as critical friend including (but not limited to):

- A review of the bus network and service proposals
  - Including creating the Superbus network
- A fares review
- Identification of target areas for bus priority and other infrastructure improvements
- Stakeholder consultation support
- Assistance with creation or review of BSIP documents
- Review of branding and publicity materials

**For a very friendly discussion on whether and how we can assist you, contact:**

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