

Bus Users response to National Transport Delivery Plan 2022 to 2027

Q1. 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?

- very positive
- positive
- neutral
- negative
- very negative

Llwybr Newydd is ambitious. The policy content supports the aims and objectives of Welsh Government to achieve modal shift and decarbonisation, and reflects the needs of passengers for an accessible, affordable, reliable and frequent bus service. However, while we believe the plan is likely to have a positive impact, it does not go far enough to tackle congestion, achieve decarbonisation targets and facilitate the level of modal shift required to make enough of a difference.

Bus services have an important role to play in tackling congestion and achieving decarbonisation targets but so, too, do coaches. It is therefore disappointing that, other than a brief mention under a review of the 'Learner Travel Measure', coaches are not mentioned within the document. Coaches play an active part in the Welsh economy facilitating tourism, school transport, private hire and scheduled, long-distance services. The recent rail strikes have seen an upsurge in coach travel in particular to London, where a standard return coach fare from Cardiff of £25.80 compares favourably with a peak rail fare return of £264.80.

Infrastructure improvements and accessibility are highlighted as key aspirations for bus services. However, there is little by way of a budget or reallocation of road space to achieve this. Quite often we see capital funding made available for infrastructure projects but the necessary revenue funding for their maintenance is not provided. An example of this are the bus shelters along the T1/T2 bus corridors which, without maintenance and cleaning, are deteriorating.

It is fair to say that bus services are facing a number of external challenges:

1 As a result of Covid-19 we are seeing changes in travel patterns that have an impact on demand. Many people now work from home and no longer commute to work, or do so only on one or two days a week. Meetings can be held online and more shopping is done online rather than in town and city centres. From discussions with operators, we understand that between 60-70% of fare-paying passengers have returned to the bus, while for concessionary fare passengers the percentage drops to around 55%.

2. Operating costs have increased by up to 60% for some operators and the present level of inflation has led to higher wage increases.

3. Congestion levels on our roads have increased in many areas and without bus priority measures in place, bus speeds have reduced, leading to increased costs.

4. The current bus driver shortage is impacting the ability of operators to provide the full number of services registered to operate. This has serious implications and impacts for passengers with short-notice cancellation of services. We believe Welsh Government should work with operators to develop an appropriate apprenticeship scheme to encourage a younger, more diverse workforce and ensure that operators are able to recruit and train sufficient numbers of drivers.

Q2: Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

- very positive
- positive
- neutral
- negative
- very negative

The plans generally align with the Llwybr Newydd. We welcome the commitment to decarbonise the TrawsCymru fleet although page 57 says this will be done by 2026 whilst page 59 says 2027. Similarly, the plans for a rollout of electric vehicles on service T22 for spring 2022 have also been missed, leading to concerns about the scope and pace of change required.

We are concerned that there are limited deliverables here and in Annex 2 relating to buses to make the changes required. Bus and coach services can play a huge role in tackling congestion and improving air quality for all. The plans for decarbonising 50% of the Welsh bus fleet by 2028 and a zero emission bus fleet by 2035 will require significant funding and it is unclear what the source of funding will be.

CPT recently commissioned research by WPI Economics and the Social Market Foundation. This suggests that, to meet Welsh climate change targets for surface transport as set out by the UK Committee on Climate Change, bus patronage will need to rise by 75% by 2030, and 150% by 2050:

<https://www.cpt-uk.org/media/fc0bzccy/decarbonisation-dividend-report.pdf>

This is a very difficult set of targets without significant measures being introduced to tackle congestion and encourage modal shift.

Q3: 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?

- fully
- partially
- in a limited way
- not at all
- unsure

While there is significant investment planned for public transport, it is difficult to understand how much of this relates to bus and coach services other than the brief mention on page 53 that “we would normally plan to spend approximately £90 million each year on supporting the sector through our grant schemes.”

There is no clear breakdown of funding allocated to bus programmes, projects and interventions in Annex 2. It is noted that a large number of these are focused on reviews and developing guidance rather than the delivery of tangible projects.

We have concerns over the amount of funding available. Page 20 of the document advises that, historically, the EU has been a significant funder of transport projects in Wales. The document goes on to refer to a shortfall in funding of £1 billion in 2024-25, funding that Wales would have received from EU schemes that the UK Government has confirmed will not be funded.

TfW stated in May 2022 that there is an overspend of “tens of millions of pounds” relating to the Core Valley Lines rail upgrade which has to be funded from somewhere:

<https://www.walesonline.co.uk/news/wales-news/big-overspend-expected-734m-south-23967222>

It would be useful for future plans to have a clearer indication of funding allocated to each sector against the programme items listed in Annex 2.

Q4: 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?

- fully
- partially
- in a limited way
- not at all
- unsure

The delivery plans reflect the well-being ambitions set out in Llwybr Newydd. We feel that the funding available will partially meet those ambitions. We are in the midst of a cost of living crisis as well as the challenges to the bus industry highlighted in the response to question 1.

Q5. 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?

- strongly agree
- agree
- neutral
- disagree
- strongly disagree

The plan reflects the priorities set out in Llwybr Newydd. However, the lack of information provided in terms of funds available and specific delivery targets means we cannot be confident the 5 year priorities will be achieved.

Q6: 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?

We feel the plan undersells the benefits of bus and coach services. Approximately 75% of public transport journeys in Wales are undertaken by bus and this mode has great potential to provide sustainable travel options given the right operating environment.

We look forward to publication of the White Paper setting out the new legislation that will be an enabler of the changes required to deliver the Llwybr Newydd ambitions. It is important in the intervening period that Welsh Government/TfW work in partnership with operators and local authorities to deliver improvements for passengers and encourage non-users to make the switch.

Q7. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

We have no comment on the Integrated Sustainability Appraisal Report other than to say very little information contained in the report relates to bus projects to be delivered.

Q8. Do you have any further feedback or comments on the plan?

The focus on the individual modes can lead to a lack of focus on the benefits of schemes between modes. For example, the plans to improve access and facilities at Severn Tunnel Junction station can benefit active travel, rail and bus passengers. We would encourage the adoption of a more multi-modal approach.

Both Llwybr Newydd and the National Transport Delivery Plan refer to Corporate Joint Committees and state that they will help deliver better integration of modes of transport and better land use planning. However, progress in forming these committees has been slow and there is a lack of clear understanding of their composition and functions.

Infrastructure enhancements are listed as a key aspiration for encouraging passengers to switch to the bus. However, there is little in the way of budget to make this happen. Scottish Government has introduced a £500 million Bus Partnership Fund and our Director for Scotland sits on several local partnership boards which have plans to deliver the infrastructure enhancements that passengers need. This serves as a clear example of turning policy aspirations into measurable, practical delivery.

There appears to be no reference in the delivery plan for mechanisms to discourage car use. We would like to see aspirations cover congestion charging, road user charging and car park levies on employers to encourage sustainable travel, with the funds raised ploughed back into public transport as is happening in Nottingham. While we appreciate that these schemes can be politically difficult to deliver, they are necessary if we are to achieve stretching decarbonisation targets.

We welcome the commitment to refresh the Memorandum of Understanding between Welsh Government, Bus Users Cymru, Office of the Traffic Commissioner and the Driver & Vehicle Standards Agency regarding the sharing of information about provision and timeliness of bus services and vehicles involved. The MOU has been very useful and ensured meaningful cooperation between the various parties, resulting in the best use of public resources in terms of bus monitoring.

Question A: We would like to know your views on the effects that the National transport delivery plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We have no comment regarding the effects that the National Transport Delivery Plan would have on the Welsh language other than the requirement for any information for passengers to be provided bilingually.

Question B: Please also explain how you believe the proposed policy, National transport delivery plan 2022 to 2027, could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no comment regarding the impacts of the National Transport Delivery Plan on the Welsh language.

About Bus Users

Bus Users is a charity that campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of a Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel.

Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at government select committees and take part in industry events to make sure the voice of the passenger is heard.

Bus Users UK Charitable Trust Ltd is a registered charity (1178677 and SC049144) and a Company Limited by Guarantee (04635458).

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