



### **Draft Local Transport Bill: User perspective**

The Association of Kennet Passengers is a voluntary organisation of public transport users from a variety of backgrounds promoting public transport and the interests of passengers in Kennet District, a rural area in Wiltshire. Kennet is typical of many shire counties and parts of rural England: sparse, not remote, but not close enough to large cities to be called anyone's "rural hinterland".

Our funds have come from voluntary bodies, individual donations, parish councils and grant making organisations. We also receive a small amount of income from passenger and market surveys and monitoring work.

We are members of Travel Watch South West and have read their submission, which has also been informed by TravelWatch East Midlands. Their answers to the questions raised by the draft Bill are balanced and fair representations.

Whilst there are measures that are mutual to rural areas the draft Bill has not been designed to ensure that the 20% of the population that live in rural areas (and those wishing to visit or work in a rural area or market town) fully benefit from these proposals. In other words, if the draft Bill is not to disadvantage rural dwellers and meet national requirements to pass the 'public interest' test, the transport needs of rural areas need to be properly and distinctly catered for.

For instance: the draft Bill tackles congestion and proposes carrots (public transport improvements) and sticks (road user charging) that benefit urban areas. The problems of traffic and public transport also have rural dimensions which are not catered for in the draft Bill.

We therefore wish to make additional points from our user perspective to supplement those submitted by TWSW, TWEM, and the Commission for Rural Communities concerning insufficient rural coverage in the draft Bill.

### **Addressing the causes of rural traffic growth through the draft Bill**

Some of the main reasons why rural transport needs to be addressed nationally are:

- 1) *Centralised services:* It is accepted that people in rural areas are more reliant on the car than their urban counterparts but their reliance is exacerbated by the migration of public facilities, goods and services to centralised points without alternative means of access. This is forcing people in, for instance, Kennet to travel outside their normal catchment areas for their basic medical services.
- 2) *Land use planning:* Proliferation of new housing estates inappropriately sited on the edge of our market towns have generated considerable commuter traffic to employment centres further afield, since the rural/small town locations cannot offer many economic prospects. The application of PPG13 has been wildly optimistic: people moving to the edge of a market town do not expect to use a bus to the nearest centre when

frequencies, network coverage and quality are so variable or inadequate. As a result we have witnessed a dramatic increase in traffic over the last 15 years on the approach roads to market towns and large villages deemed 'sustainable communities'. Peak hour traffic around main centres has now become stop-start congestion and traffic chaos ensues whenever road works occur, and the cry goes up for a bypass.

3) *Urban/rural 'traffic exchange'*: The extent to which rural traffic impacts on urban areas and urban traffic impacts on rural areas is considerable but not readily appreciated. An analysis of traffic exchange around Bristol and Somerset has been included in an essay by Land Use Consultants on Sustainable Rural Communities for the Commission for Rural Communities (see **Annex 1** attached separately). This example suggests the importance of getting the rural/urban coverage for public transport.

4) *Landscape traffic impacts*: The landscape character is at risk from becoming suburbanised from traffic management measures. We have witnessed the erosion of beautiful countryside some of it designated landscape (AONB and World Heritage Sites) from hard edged engineering: newly sprouted traffic lights, roundabouts, signs, concrete kerbs along country roads. There is constant pressure for road building, a pressure that local politicians find hard to resist.

5) *Rural car ownership*: Despite the above traffic problems and heavier reliance on the private car there are many rural households without a car, or with only one car which might not be available during the day. See example of census analysis in **Annex 2** below.

The solution to these problems require a combination of

- adequate revenue funding,
- right governance for community participation,
- strategic public transport networks,
- rural demand management.

The last three measures could be provided for in the draft Bill in rural terms, such that they would complement new investment in rural public transport and bring about better value for money.

The first measure could be provided in part by a rural levy from metropolitan and other urban road user charging regimes. In addition it could also be funded by a rural parking levy (see 'rural demand management' below).

### **Problems with rural public transport**

Most buses in Kennet are subsidised. Wiltshire struggles to maintain Kennet's bus network in the face of rising costs. For instance they are unable to match the loss of revenue brought from the DfT's former Rural Bus Challenge Fund and have been forced to cut various parts of timetables valued by passengers.

On the other hand the free concessionary scheme has encouraged those unused to travelling by bus to venture away from their rural car.

But this positive market interest fails to realise the potential of the local network because buses:

- Don't start early enough
- Don't run late enough
- Don't run frequently enough at peak times
- Vehicle standards are too variable

Uncertainty: bus information is of poor quality  
Waiting facilities are variable  
Timetables can vary at random  
Real time information has been trialled unsuccessfully in Wiltshire

Access to rail is hit and miss. For instance Devizes, the largest town in Kennet does not have a railway station but nearby Pewsey does, but it is not readily accessible by bus. Buses to other rail heads such as Swindon, Chippenham, Westbury and Salisbury do not offer an integrated network frustrating efforts to carry out business in regional centres such as Reading, Bristol, Taunton and Exeter.

### **Setting standards of public transport provision for a strategic network**

1) A minimum standard of public transport provision is of greater importance to Kennet than a Quality Partnership where opportunities for a local authority to provide a bus lane are limited. The standards need to be set for a *Quality Network*, not just on a route by route basis.

Where there are commercial operators cherry picking the profitable times of a route, or providing services only when their buses are not busy on school runs, and the local authority is left to fill the gaps, we have found the standards of provision generally poor. The draft Bill needs to truly put the interests of passengers first rather than the convenience or profitability of the bus company. Local transport authorities with large rural catchment areas should be required to describe an Integrated Strategic Network for a defined Rural Public Transport Catchment Area that can be let on a 10 year franchise basis.

2) Passenger numbers is not always the best performance indicator where coverage and rural access are more important objectives. The performance test for a Rural Public Transport Catchment Area should be Best Social and Operational Value.

3) In the above scenario Rural Public Transport Catchment Areas should be defined in much the same way as Areas of Outstanding Natural Beauty, and be managed irrespective of the local authority boundary.

### **Governance and participation**

1) In Chapter 4 there is no critical analysis of the County Council/Unitary Authority in terms of transport effectiveness. Kennet Passengers commissioned a report to explore appropriate governance to address the dysfunctional nature of how rural transport is organised which we commend (attached as **Annex 3**).

We wish to see:

- national standards which are readily understood, coherent and consistent
- governance in non-metropolitan areas properly reviewed
- Integrated Transport Strategies for rural areas managed by Rural Public Transport Catchment Area management boards with similar powers as those conferred to PTAs.

2) Rural bus passengers are so dependent on their life line that often they do not wish to rock the boat by complaining or speaking up. A statutory voice is essential but managed on a local basis. Raising standards of expectation and publicising reliability performance are vital to encourage greater participation. Provision should be made for all participation in public transport processes: planning, design, implementation, monitoring, and feedback.

We agree with the Select Committee that it should not just be a voice for making complaints.

3) It should be a requirement of Quality Partnerships or Quality Networks (as envisaged above) to involve the community.

### **Flexible transport, taxis and private hires**

The guidance on flexible transport has been too dominated by competition with taxis and private hire operations. Taxis and private hire cars are the main commercial providers for rural areas and are a very important mode for rural dwellers, particularly young people and households without cars. If these could be brought into the family of public transport legislation two obstacles to passenger use could be overcome: (a) call centres for flexible buses and taxis could be combined and (b) booking requirements could be relaxed. Our proposal here is to bring licenced taxis and private hire operators within the scope of the draft Bill and offer a Bus Subsidy Operators Grant (or its successor).

### **Traffic commissioner**

1) Effective practice in public participation of a modern public transport service is likely to generate more work for Traffic Commissioners who must be resourced to carry out their duties efficiently and thoroughly.

2) Timetable changes are too haphazard. We would like to see a maximum of two timetable changes per route per year approved by the Traffic Commissioner at standardised six monthly intervals.

### **Rural Demand Management**

Parking charges are an emotive topic in small market towns struggling to survive economically. The time for levelling the playing field is long overdue. The draft Bill should include:

- a parking levy for out of town/edge of town retail and entertainment parks
- a minimum parking fee for public car parks

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## ANNEX 1

James Shorten/Land Use Consultants (2005) *Sustainable Rural Communities*: "It's not just about transport is it?" Second of five essays for Commission for Rural Communities

Submitted separately as pdf

## ANNEX 3

Headicar, P (2004) *Planning for a Step-Change : A passenger transport strategy for rural areas* Association of Kennet Passengers

Submitted separately as pdf

ANNEX 2

*Devizes Town and Devizes Community Area*

**Cars and vans per household\***

Table showing the large proportion of households of no car or one car in both categories (market town without and with rural hinterland) for whom public transport, taxis, private hire and lifts are likely to be vital.

Parish	No Car + One Car combined	No car		One car	Two cars		Three cars		Four or more cars		All cars **	
<b>Devizes</b>	<b>72%</b>	<b>1,219</b>	<b>25%</b>	<b>2,339</b>	<b>47%</b>	<b>1,119</b>	<b>23%</b>	<b>219</b>	<b>4%</b>	<b>47</b>	<b>1%</b>	<b>5,453</b>
<b>Devizes Community Area (includes 20 parishes)</b>	<b>59%</b>	<b>1,922</b>	<b>16%</b>	<b>5,135</b>	<b>43%</b>	<b>3,802</b>	<b>32%</b>	<b>830</b>	<b>7%</b>	<b>245</b>	<b>2%</b>	<b>16,319</b>

Source: 2001 Census (Key Statistics) via Wiltshire County Council. Crown copyright 2003.  
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**Notes:**

\* Includes any company car or van when available for private use.

\*\* 'All cars or vans in area' only those cars and vans owned by, or available for use by, households

- This count is not exact as households with more than 10 cars or vans are counted as having 10 cars or vans.
- Cells in this table have been randomly adjusted to avoid the release of confidential data.