Bus Users UK response to the Welsh Government Consultation: Connected Communities, Tackling Loneliness and Social Isolation

Bus Users UK welcomes the Welsh Government Consultation into a critical issue for communities in Wales.

In recent years, we have seen the damaging effect that the decline in bus service provision has had on people, communities, businesses and opportunities across the country. Good quality public transport is pivotal and central to quality of life and, as such, must be elevated in importance in government policy.

Our response to this consultation is therefore focused on Question 7: What more can Welsh Government do to support the improvement of transport services across Wales?

Summary of main points

- Without good public transport, deprivation and inequality will continue to rise, particularly in rural areas where it is an already intractable but often hidden problem that leads directly to loneliness and social isolation.
- Local people whose bus service has either been cut or is currently under threat, consistently report that the bus is their lifeline to vital services, social events, work and education. Without this lifeline they experience feelings of isolation, loneliness and despair.
- Reliance on better Internet connectivity cannot adequately meet the needs of communities. While many online activities such as shopping or banking can be done in person, activities such as access to health and education need to be accessed in person.
- Government policy needs to change radically: services should be planned holistically around the needs of communities, especially younger adults, and should be delivered at a fair price to users.
- The regulatory model under which bus services operate needs to change, with provision made for the views of passengers, communities, and potential users of any new service, taken into account.
- The role of Local Authorities needs to be reviewed, with greater requirements for them to ensure the provision of accessible and affordable services, built around the needs of the community.
- Rather than an inappropriate use of scarce public resource, funding for bus services needs to be seen for what it is: an investment in social cohesion that delivers excellent social, economic and environment benefit for all.

The view of local residents

Through our local events programme we hear, first-hand, the issues and concerns raised by bus passengers. One such event was held in Overton on Dee, a rural community in Wrexham where the local service had been reduced from hourly, to just four times a day, causing severe hardship. One young mother told us that she has a sight impairment meaning that she cannot drive and is reliant on the bus. Because of changes to the service, she and her infant son are no longer able to attend a local sure start scheme or other mother and toddler groups, which has left her feeling lonely and socially isolated.

At an event in Pontneddfechan in Powys, the community had just lost its bus service. One older woman explained that the bus service had been her lifeline, her link to the outside world and her main form of social interaction. She told us that without it she was lost and experiencing feelings of loneliness and despair.

In Coelbren, Powys, the bus service was under threat when we held an event. People told us about their reliance on the bus service with two people reporting that they would consider moving house if the bus service was cut. Some young people explained that the bus was the only way they could travel to the nearest college some 18 miles away. Without a bus service they would have to walk 1.5 miles along poorly lit roads each way to access an alternative service.

The bus plays a significant role in helping people to overcome feelings of loneliness as shown in a recent survey (October 2018) conducted by ComRes on behalf of Greener Journeys[1]:

- Almost two in three people admit to feeling lonely, with younger people more likely to say this
- A third (33 per cent) of people admit that they deliberately catch the bus to have some human contact, whilst for some a bus driver, barista, post worker or store attendant might typically be the person they speak to in a day where they do not speak with someone close to them
- Two thirds of bus users believe that the bus creates strong community ties
- Loneliness is particularly acute among younger people, with 83 per cent admitting to feeling lonely compared to 46 per cent of those aged over 65
- Of the 2,000 people polled, almost half (48 per cent) said they have gone at least one day a week without speaking to a friend, family member, work colleague or carer, in person. Of these, 39 per cent said it was because they didn't leave the house; 24 per cent said it was because they live alone; and 22 per cent said it was because no one tried to talk to them. Almost one in five say they can wait for a week before speaking to anyone and almost one in 10 (7 per cent) will go an entire month without having a conversation.

Launching the report, Claire Haigh, Chief Executive of Greener Journeys, said:

"Not only is investment in bus networks vital for creating social cohesion, but it delivers excellent value for money. Funding for bus services delivers up to £3.80 in wider social, economic and environmental benefit for every £1 spent. And investment in bus infrastructure can deliver more than £8 of wider benefit for local economies and is the best way to tackle pollution and congestion."

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[1] https://www.comresglobal.com/wp-content/uploads/2018/10/Greener-Journeys_ComRes_Data-Tables_September-2018.pdf

Question 7: What more can Welsh Government do to support the improvement of transport services across Wales?

The context

- Improving public transport brings much wider societal benefits.[2]
- A lack of transport opportunity leads to social exclusion and an increase in problems related to loneliness and social isolation.
- Social isolation is not confined to older people or those with disabilities but all members of the community, and especially younger people because they are isolated from their own peer group expectations as well as educational and employment opportunities.
- The commercial market no longer provides adequate transport as shareholder pressure determines otherwise.
- Local Authorities (LAs), to the extent that they fund bus services anyway, have tended to focus their inputs on providing access to shops and, by extension, to health services rather than journeys to college, work or apprenticeships. The focus on daytime services ignores the work pattern of people in entry-level jobs which often have shifts which cannot be served by such services. There is also a clear need for transport to get all adults and especially younger people to evening events and activities. In that way the needs of young people have been comprehensively ignored, which has led to higher car ownership levels among those who can afford it, and greater isolation amongst younger adults.[3]
- The only conclusion that can be reached is that local authorities have done this (a) in order to retain services that were traditionally always there, such as the market day bus and (b) because older people are seen as more important and active politically than younger ones. It is an outdated approach which does not take account of changes in modern living patterns.

Commercial operations

- Commercial services have declined which appears to be mainly due to cost increases, especially regulatory costs associated with transport policy, and labour and environmental legislation. This has been exacerbated in some areas by the activities of unnecessarily over-zealous regulators.
- At the same time, whilst demand has not reduced as much in rural areas in the last decade as in urban areas of England or in Wales and Scotland, operator income has fallen due to reduced levels of concessionary fare reimbursement and BSOG/BSSG which impact specifically on marginal services, often those in rural areas.
- The other cause of commercial service decline is the pressure on operators to deliver against shareholder expectations, realistic or otherwise. The perceived threat of franchising has led to cross-subsidy being subtly moved from the historic model of urban to rural, increasingly becoming city to marginal urban areas. Urban costs have risen sharply as well because of worsening congestion, which operators attribute directly to central government policy.
- Reliance on commercial operations alone therefore is insufficient to provide communities and businesses with the transport facilities they need. However, there should be a continuing role for their provision of attractive inter-urban routes, into which local feeder

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[2] KPMG for Greener Journeys 2017 report "The True Value of Local Bus Services " which finds "it is clear that investment in local bus markets generates significant benefits to passengers, other road users and the wider community."

[3] Joseph Rowntree Foundation "Young People and Transport in Rural Areas" 2000

routes can be provided. Not only does this increase the potential for rural accessibility, it also feeds revenue to the trunk routes making them more sustainable.

Local authority policy and funding

- Local authority (LA) contracted services, designed in accordance with the 1985 Transport Act to act as a safety net for what the commercial market does not provide, have been withdrawn faster than commercial cutbacks due to political decisions to reduce or remove subsidy. This was clearly not the intention of Section 63 of the 1985 Transport Act but the lack of a statutory duty being imposed or any successful legal challenge has led to a focus only on statutory duties being met by LAs and consequent severe cuts to bus services in many, mostly rural areas.
- Many LAs have seen dial-a-bus type operations as a cheaper alternative to providing conventional services. However, with a few notable exceptions, for example Bwcabus, few if any such conversions have been sustained for more than a short period of time. Transport Focus research has shown that, whilst operating costs may reduce, so too do passenger numbers as the lack of travel flexibility, the non-acceptance of concessionary passes and the need to pre-book turn customers away. Net costs therefore increase, and subsidy per passenger escalates such that it is not a sustainable alternative.
- The UK Government Secretary of State has suggested that Uber-style flexible taxi operations could serve rural areas instead of conventional bus routes. It is surprising that it is considered that commercial businesses would move from urban market opportunities to the always less commercially attractive ones in rural areas. Technological innovators in this field say that this is not, and will not, be an option, for a decade or more.
- If commercial services are being cut back for commercial reasons and contracted ones for LA budgeting reasons, then the resulting loss of service is considerable. The outcome is rarely holistically planned to ensure the best supply from minimum input costs because of the artificial division between commercial and contracted operations.
- The losers in all of this are people: real people who are left without access to basic services. The result is rural depopulation or, where second homes are a real rural attraction, a greater sense of being driven out. Research into social exclusion clearly points to good bus services as a major factor in improving deprived areas and shows the impact on communities if these are lost: "If we end up with a diminished bus service we'll have more excluded people, there's just little doubt about it".[4] This situation is due to the consequences of government policies and it is government policy that must now change if the damage is to be overturned.

Changing government policy – objectives

- Tinkering with now outdated legislation is insufficient; policy has to change radically in order to revitalise bus services in order to maintain community links.

  - Services have to be planned holistically and designed to meet the clear needs of communities, and especially younger adults in order to avoid loneliness and social isolation.
  - Services have to be delivered at a fair price to users, and this may well require a reappraisal of what constitutes fair reimbursement to operators for older and disabled people's travel.

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[4] Joseph Rowntree Foundation "The benefits of providing new public transport in deprived areas" 2008

Changing government policy – regulatory model

- The regulatory model under which bus services operate needs to change if loneliness and social exclusion is to be addressed and avoided. The Traffic Commissioners are currently charged with ensuring safety of passengers and other road users, and that is quite proper. However, they have themselves inferred that this includes fair competition between operators. In rural areas, almost without exception, there is now no competition so they only regulate safety. Unlike other regulators there is no provision whatsoever for taking into account the views of passengers and the communities served or the potential users of any new services. We believe that this has to be reintroduced into the regulatory model, especially where the market is sufficiently small that free market competition does not deliver adequate and appropriate quality and protection to the consumer as the current model risks isolating entire communities.

Changing government policy – operating model

- The operating model also needs reinvigorating. Commercial operators seeking fair returns for investors are understandably less committed to low profit margin bus services than are SMEs or other models. It seems that SMEs have largely quit the market because of more onerous regulatory conditions being imposed at the same time as income from concessionary reimbursement is reduced. Community Transport (CT) was seen by government as potentially the answer, but the Department for Transport has introduced new rules which are having a hugely deleterious effect on this valuable alternative delivery model. It does not serve the people and communities if consumers are not served because Community Transport operators cannot meet the same conditions as commercial operators. Our observation is that Traffic Commissioners and DVSA feel that these new rules support fair competition but it is clear that the impact of these changes is catastrophic on communities. It seems to be hard enough to supply small-scale rural services to people who rely upon them without rule changes that seem to be out of proportion to the service offered and result in no service at all being provided to swathes of the rural population. These are foreseeable consequences and are entirely avoidable.
- In reinvigorating the operating model, government should investigate the role of Community Interest Companies (CICs) and Social Enterprises (SEs). In a growing number of cases, these models have rescued other rural facilities such as pubs and shops. There is no intrinsic reason why the same model cannot be adapted to apply to rural bus services, so long as the approach of the regulators takes account of the needs of the people affected and their terms of reference redefined accordingly in legislation.

Changing government policy – role of local authorities

- The role of LAs also needs to be reviewed. Much damage has been done by LAs taking a top-down 'helicopter' view of the needs of communities, usually from an urban base and perspective, rather than a bottom-up approach led by consumers. This has contributed to the mismatch between demand and supply explained earlier, leading to the conclusion that investment in transport has come to be seen as an inappropriate use of scarce public resource.

    o LAs should be required to have a current bus strategy which is updated and rolled forward at regular intervals and a requirement to deliver in accordance with it. LA's should be provided with appropriate funding to deliver this strategy.

- The role of LAs should be to ensure that consumers get a level of service that enables them to meet their reasonable travel needs, recognising that what is reasonable will vary by age group and other demographic and social criteria.
- LAs should ensure that affordable fare and ticketing arrangements are implemented Currently, prices tend to be set by distance, but the more rural a community is, generally the lower the income levels tend to be, so distance-based fares become the least affordable.
- LAs should understand travel patterns, current and desired, in order to ensure appropriate connectivity, for example between bus and bus, and bus and rail with appropriate ticketing alignment.
- LAs should procure services with minimum standards in mind, but they should cease regarding this as their sole or only duty and consider how services could enhance the quality of lives of the communities they serve.
- LAs should have placed upon them a requirement that consumers and would-be consumers have access to good quality service information delivered via a variety of media channels, not relying solely on internet-based channels.
- LAs should have placed upon them a requirement to liaise with local business groups, retail and leisure outlets and places of education, training and employment in order to align service planning with their needs.
- LAs should have placed upon them a requirement to liaise with local health service providers and clinical commissioning groups to align service planning with their needs.
- LA planning officers should not recommend new housing schemes unless a proper transport plan is submitted and assessed as feasible.

Conclusion

- This model requires operators to forego a degree of control over their own business affairs, but falls short of franchising which removes it completely. It provides a more stable environment for operators to plan their investments.
- This model recognises that people and communities require access to affordable and accessible public transport in order to have any reasonable quality of life, as the costs of addressing the many problems of social exclusion will hugely outweigh the costs of investment in good public transport.
- Without good public transport, deprivation and inequality will continue to rise, particularly in rural areas where it is an already intractable but often hidden problem that leads directly to loneliness and social isolation. Good quality public transport is pivotal and central to quality of life areas and, as such, must be elevated in importance in government policy direction.

About Bus Users UK

Bus Users UK is an independent, registered charity that aims to bring people and communities together, through socially inclusive transport.

We are an approved Alternative Dispute Resolution (ADR) Body for bus and coach passengers, and the body which deals with complaints under the European Passenger Rights Regulation (outside London).

We have worked closely with the Department for Transport to advise on passenger rights, the passenger involvement aspects of the Bus Services Act 2017, the detail of the proposed Accessible Information Regulation and all other matters where input on behalf of passengers is needed.

In Wales we deal with complaints from bus passengers and work alongside communities to try to make the case for continuing service provision and subsidy. We also hold regular events in rural and urban settings so residents can make local transport providers and policymakers understand their needs and the impact of poor transport on people at risk of social exclusion. We employ three bus compliance officers who conduct roadside monitoring, often as a result of complaints received. On occasions this monitoring results in a public inquiry overseen by the Traffic Commissioner.

Bus Users UK Charitable Trust is a Registered Charity number 1178677 and a Company Limited by Guarantee Registration Number: 04635458

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