

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL

SUBMISSION FROM SCOTTISH ASSOCIATION FOR PUBLIC TRANSPORT

Introduction

The Scottish Association for Public Transport (SAPT) was formed over fifty years ago to campaign for an **integrated public transport system** for Scotland as an alternative to unsustainable growth in car travel. The Government's **National Transport Strategy** (NTS), refreshed in January 2016, has similar objectives.

Our comments on the Scottish Transport Bill focus on whether the bill is likely to achieve the outcomes of the NTS, particularly **transport integration and connections**.

Countries with well integrated public transport have enjoyed **sustained growth in bus usage**, compared with Scotland's deregulated and uncoordinated system which has suffered steady decline in journeys made by bus in most areas (see Appendix).

Maintaining a Scotland-wide network of local bus services will need more targeted financial support, particularly for rural routes. The draft Transport Bill does not contain any reforms of the financial support framework for the bus industry, including the bus service operators grant (BSOG), concessionary travel scheme, and local authority subsidies. This is discussed in Section 3.4.

Our comments on the draft Transport Bill are given in section 3. Before this it is worthwhile reiterating key elements of the National Transport Strategy in section 2.

National Transport Strategy

The Scottish Government issued a refresh of the National Transport Strategy in January 2016 updating the objectives (NTS page 38):

“One of the NTS high level objectives is to improve transport integration, particularly across the public transport system, so that transport providers offer a seamless, door to door public transport experience. This could be a key driver to increase the use of public transport, which in turn should reduce traffic congestion and emissions.”

One of the five high level objectives (NTS page 46):

“Improve integration by making journey planning and ticketing easier and working to ensure smooth connection between different forms of transport.”

The first of the three key NTS strategic outcomes (NTS page 47) is:

“Improved journey times and connections, to tackle congestion and lack of integration and connections in transport”

Recommended Amendments to Scottish Transport Bill (references are to Transport (Scotland) Bill Policy Memorandum June 2018).

Policy Objectives of the Bill (policy memorandum para 5 – 8):

Comment: There is no reference to transport integration, or to the National Transport Strategy.

Policy Objectives of the Bill – General Overview (policy memorandum paras 14 – 19)

Bus Services (policy memorandum para 19)

“Bus services play a vital role .. across Scotland. Their flexible nature means buses are able to serve a much wider area than transport modes such as rail, which can be more restricted by geography and, of course, fixed infrastructure.”

Comment: This comparison of bus and rail misses the main point of an integrated public transport approach. The objective of transport integration is to combine the flexibility and wide reach of local bus services with the speed and comfort of the national rail system, funded by Transport Scotland, to create a co-ordinated, high quality public transport network with wide geographical coverage, catering for local and long distance travel.

Our Association recommends that better transport integration should be included in the bill's policy objectives, making the Scottish Transport Bill consistent with the Scottish NTS.

Policy Detail and Background for Specific Topics: Bus Services (paras 62 – 100 of policy memorandum)

Franchising (paras 73 – 76 of policy memorandum)

Comment: The franchising provision of the Bill potentially should allow a local authority or RTP to formulate and implement a comprehensive transport plan covering bus services, bus/rail/tram/subway/ferry integration (where appropriate), parking charges, road priorities, cycle and walking infrastructure, and land use planning. This is consistent with the objectives of the NTS.

For instance, the Glasgow Connectivity Commission is expected to make recommendations for transforming transport and active travel in the Glasgow area, where bus travel has been declining most steeply. These could involve multi-modal transport developments.

The City of Edinburgh Council is also considering multi-modal improvements to public transport, possibly extending high capacity trams to Leith and Newhaven integrated with the bus network. This would reduce emissions and the number of vehicles in the city centre, including the over-congested Princes Street.

It may prove necessary to introduce a bus franchising scheme to deliver comprehensive strategies of this scale. Any such plan should be subject to scrutiny. The Bill proposes that this scrutiny would be performed by an independent panel (para 75 of policy memorandum), appointed by the Traffic Commissioner (para 89). According to the policy memorandum, this de-politicises the final decision making (para 76).

However, this “de-politicisation” could well undermine the concept of democratically elected local authorities implementing transport policies supported by, and benefitting, the majority of local people, including transport users, pedestrians, cyclists and people with respiratory and other health difficulties.

Transport decisions need to take into account these wider issues not normally considered by the Traffic Commissioner, an office which is currently confined to regulating commercial road transport undertakings.

Our Association recommends that the Bill should lay out a procedure for scrutinising bus franchising schemes that guarantees transparency, and fully takes account of the National Transport Strategy, and transport policies of the relevant local authorities or RTP.

Information (paras 77 – 81 of policy memorandum)

Comments: We welcome the Bill's provision of powers to require all bus operators to provide information for the public on routes, timetables, running times and fares.

The Bill will also give powers for local authorities to obtain revenue and patronage for de-registered services in order to be able to invite bids for replacement services.

The decline in bus use in urban areas is partly caused by road congestion. Any major investment in infrastructure to increase the use of public transport and overcome road congestion (additional bus lanes, tram or metro routes etc) needs dependable predictions of passenger figures and financial return. Without information on existing passenger flows, future transport demand and financial forecasts will be less reliable.

Our Association recommends that the Bill should give powers to local authorities/RTPs to obtain bus patronage figures for transport corridors where multi-modal strategic infrastructure investment plans are being evaluated.

Financial Support Framework for Bus Services

The Bill does not propose any changes to the financial framework for bus service support. Pressure on local authority finances are a threat to the funding available for maintaining unremunerative bus services. Service and route withdrawals will accelerate the decline in bus use, particularly in rural areas, and will isolate people without access to cars. This will particularly affect the younger generation (who have lower car ownership) and old people.

Bus operators in Scotland received £301 million from local or central Government in 2015/16. Only £59 million of this was provided to support socially necessary services by local transport authorities. The rest (£242 million) was given through the Bus Services Operators Grant (BSOG) and concessionary travel reimbursement to all local bus services including profitable services (Scottish bus companies earned profit margins of 8.6% on average in 2016). Passenger revenue from ticket sales amounted to £370 million.*

To safeguard a widespread network of local buses, adequate financial support for unremunerative bus services must be maintained. As an increase in public spending is unlikely, the alternative is to focus the existing level of support more closely on unremunerative bus routes. One method would be to replace the BSOG by a new Bus Integration Grant targeted at improving transport integration. The grant would be available to local and regional bus services co-ordinated with each other, and where appropriate with ScotRail services, and would be administered through local authorities/ RTPs rather than central government.

The Bus Integration Grant (together with Transport Scotland's ScotRail franchise) would focus public funding on maintaining a bus and rail co-ordinated public transport network providing strategic connections for all towns and villages. Bus services within this strategic network would be provided by BSIPs (Bus Service Improvement Packages) or franchises.

Our Association recommends that a new Bus Integration Grant should be introduced, replacing the current BSOG. The Bus Integration Grant would be available to support routes providing essential connections in a strategic national bus and rail network giving every village and town access to a high quality public transport service.

*Data from “Local Bus Services in Scotland – Improving the Framework for Delivery”,
Transport Scotland

Conclusion

The bill as it stands does little to reverse the decline in bus use, or to implement the Scottish Government’s transport integration policy in the National Transport Strategy (January 2016). Evidence from other European countries shows steady growth in use of integrated public transport compared with the decline in use of the largely disconnected local bus routes in Scotland.

The Scottish Government allocated £242 Million of public funds to the bus industry in 2015/16. At least £53 Million of this could be redirected by replacing the general BSOG grant with a new Bus Integration Grant administered by local authorities/RTPs, focused on developing and supporting a strategic network of integrated bus services, co-ordinated where possible with trains and ferries. The Bill should be amended to implement more visibly the Government’s laudable transport integration policy.

Appendix

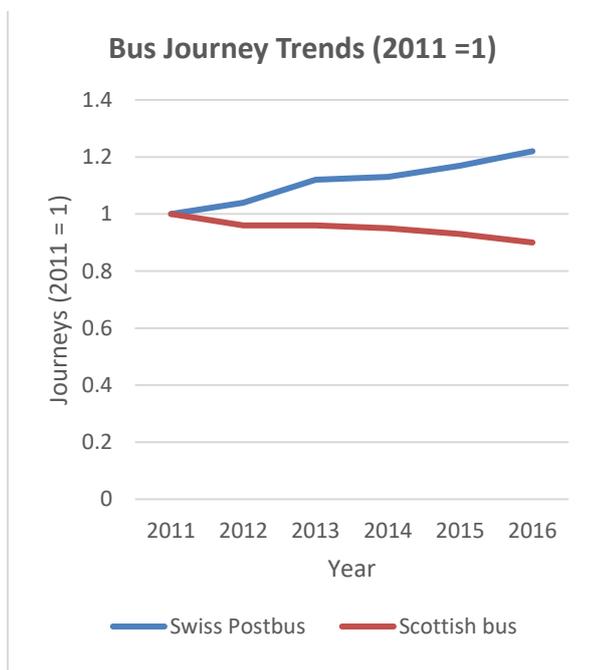
Integrated and Deregulated Bus Usage Statistics

Bus deregulation, introduced with the 1985 UK Transport Act, aimed to encourage private enterprise bus services as a means of encouraging greater usage while reducing the need for public subsidies. However, bus passenger numbers, which had been declining for decades, have continued to decline in many areas of Scotland, partly due to increasing car ownership and road congestion.

Some European countries have taken a different approach, adopting an integrated public transport policy. Urban bus, train, tram and underground routes are planned to connect reliably with each other, making it easy to make multi-leg public transport journeys. Many rural buses connect with the national rail network at regional railheads. There is no on-street bus competition, reducing road congestion, pollution and CO₂ emissions, but services are often franchised to private operators, maintaining the benefit of competition on costs.

Comparing Scottish local bus usage statistics with Switzerland (the best example of integrated transport in Europe) shows that between 2004 and 2014 bus traffic in **Scotland fell by 10%** (Scottish Transport Statistics) while **Swiss bus traffic rose by 21%** (<https://www.voev.ch>).

Year-by-year figures for Swiss Postbus (mainly rural services) and Scottish local buses (below) show a continual decline in Scotland, and steady growth in Switzerland:



	Swiss buses:	Scottish buses:
	Postbus only (million Journeys)	all local buses (million journeys)
2011	124	436
2012	129	420
2013	139	421
2014	141	414
2015	145	407
2016	152	393

Journeys by bus (millions per year) compared for Swiss Postbuses and Scottish local buses. Sources:

www.postauto.ch

Scottish Transport Statistics

This data confirms the importance of the National Transport Strategy high level objective to improve integration. This should be enshrined in the Scottish Transport Bill.