

National Federation of Bus Users

Comments on Draft Transport (Wales) Bill

General

NFBU in Wales welcomes the broad principals and intentions of the bill and particularly the greater autonomy provided to the Welsh Assembly Government in the management of affairs related to public transport in Wales. In particular the formalising of Joint Transport Authorities is welcomed although it is accepted that constituent local authorities could be likely to resist removal of powers. Nevertheless, there has been concern that there is a diversity of commitment and approach to public transport. Public transport is not related to relatively meaningless authority boundaries.

The Bill

7 Provision of passenger transport services

It is welcomed that The Assembly Government may secure provision of public passenger transport services which may not otherwise be met. It is assumed that this could relate in particular to land based services that may cross regional boundaries. It is not clear from the draft whether the Assembly will have powers to direct JTAs to work together in the provision of services that cross their boundaries. This is a necessary requirement.

8 Rail Passenger Committees

NFBU would wish to see funding for bus passenger representation in Wales. Currently RPC enjoys approx. £280K per year from SRA to fund its activities. Rail passengers account for less than 20% of all public transport journeys in Wales. The remainder are by bus. The recently increased level of funding for NFBU activities in Wales is much appreciated but in the long term we would wish to see that funding secured and increased such that representation can be enhanced and provided on the same regional basis as the proposed JTAs. It is not considered that a statutory body is necessarily required as the existing relationships with local authorities/JTAs and bus operators are generally very good. However NFBU in Wales would have no objections to the creation of such a body either independent of or linked to RPC.

As an aside to this there have been recent suggestions that RPCs may be abolished. If this is true then the Bill should include clear means for WAG to ensure that representation for both rail and bus passengers is enshrined within it.

11 Financial Assistance for Air Transport Services

NFBU wishes to express grave concern at the possibility of financial support for air transport and the diversion of any such funds away from more practical and sustainable forms of transport.

Air transport can benefit only a very few people and required financial support is likely to be vastly out of proportion to the benefits that may accrue. Such moneys should instead be spent on land based public transport which will have greater benefits for far more people. It is entirely unclear why the Bill should seek to provide such financial support or who will be the beneficiaries other than airline and airport operators.

Air transport is:

- Environmentally unsustainable.
- Disruptive to large numbers of people who live near flightpaths and airports.
- Paying no duty on its fuel (which if imposed would make it commercially unsustainable)
- Highly commercially sensitive to changes in fuel prices. It is well documented that low cost airlines are already under extreme financial pressure.

It is believed to be a matter of gross folly to consider the use of public money for something that, it is believed, provides almost no tangible benefits and a great many unwanted 'spin-offs'. Further development of regional airports in Wales and intra-Wales services is questionable to say the least. Such services have been tried on and off for the last 60 years and have always resulted in failure. Wales already has a very adequate international airport at Cardiff. International carriers are unlikely to have any interest for instance in serving (say) any north Wales 'International' airport because of the (flying) proximity to Manchester.

Other matters

a) The Office of the Traffic Commissioner

NFBU would wish to see the Bill incorporate a mechanism to bring the office of the Traffic Commissioner into Wales rather than based in Birmingham. Whilst this is not, in any way, a criticism of the staff employed with whom NFBU enjoys good working relationships, it is evident that the lack of local knowledge is not always conducive to efficient working. Additionally, and more importantly, it is clear that the powers of the Traffic Commissioner to deal with bus operators whose standards of service do not meet even the basic legal minimum are lacking when fully challenged. A ruling by the TC against an operator over 2 years ago has not yet been implemented because of the process of appeals. However NFBU continues to receive complaints about this operator from both members of the public and from MAs and MPs. The Bill should include further funding provision for increased monitoring of services in Wales. The present establishment of 3 monitors, based at 3 locations in Wales is inadequate. It is appreciated that 2 of these monitors are already funded by WAG. NFBU would wish to see at least 2 monitors in each of the proposed JTA areas.

b) Brecon Beacons National Park

Whilst not directly related to NFBU we would wish to bring to the attention of the Committee the unique position of the National Park. The NP has no statutory direct responsibility for public transport but clearly because of the statutory purposes of National Parks it has a profound interest. Currently the NP falls within 7 different local authority areas. The vast majority of the NP area lies within Powys yet it occupies only a small part of the area of Powys. A consequence of this is a lack of clear ownership of responsibility for public transport provision within the NP area, much of which has to be specialised in nature. Similar problems could well arise under the auspices of JTAs since the NP will still fall within 3 of them. Whilst the majority of the NP geographic area could fall within a Mid Wales JTA its chief catchment area and the citizens that can benefit most from access to the NP are in the two south Wales JTAs. We would wish to see this reflected in the constitution of the JTAs such that the economic benefits that can be gained by the NP area and the environmental/health/leisure benefits that can be gained by the South Wales JTA areas are properly matched and catered for.

Explanatory Notes

37

This clause states that an additional 4 posts could be created within the WAG in relation to the enhanced powers concerning the railways. The precise role of these posts is not clear but at a salary level of around £15k per year or less it must be assumed that they will be junior posts with little responsibility. NFBU would like clarification of this before offering further comment.

38, 39 & 40

It is not accepted that there will be no additional cost if the aim of the Bill is to assist in the provision of better public transport services. As has been said there may be some economies of scale through a regional approach to the employment of existing local authority public transport staff and publicity provision. However, it is believed that there are many authorities that are understaffed and spend inadequate amounts of money in providing information, roadside publicity and bus stop/station infrastructure. If the new JTAs are to provide a comprehensively better service to public transport users then increases in staff and costs will almost certainly follow. It is understood for instance that English PTAs have a far higher staffing level per head of population than enjoyed (suffered?) by any Welsh local authorities. This is reflected in the levels of service provision, fares and information provided in places such as west Yorkshire and Greater Manchester.

It is entirely unclear how the figure of £1M running costs has been arrived at or precisely to what it relates. NFBU would like to see clear estimates of the funding required for the running of PTAs before commenting further. ly

Partial Regulatory Impact Assessment

3 Policy Aims

NFBU would wish to see clear traffic reduction targets incorporated into the policy aims. Even with existing levels of traffic congestion bus passengers pay a premium of at least 10%, a reflection of the cost of providing additional resources dedicated simply to dealing with the results of and delays caused

by traffic congestion. NFBU would wish to see incorporated into the Bill measures that link public transport provision clearly with issues such as land use planning and parking controls. By adopting a regional approach to car parking management for instance it would reduce the opportunities for individual towns to play each other off in attracting shoppers. It is accepted that where there is social deprivation relaxing of such measures may have a part to play.

8.7 Joint Transport Authorities

NFBU would wish to see a stronger link between highway authorities and the public transport responsibilities. Cases can be quoted where highway authorities and the non-public transport part of local authorities have acted very clearly against the interests of providing adequate public transport facilities. Recent events in Brecon are a clear example of this mismatch.

9.2 Risk Assessment

NFBU notes the desire to reduce car commuting journeys from the current levels of 80% to 75% by 2010. This is an ambitious target since it requires a growth in the use of other modes of 25%. No mention is made specifically of the impact that the 'school run' has on congestion and the other associated ills of unbridled car use. NFBU would wish to see clearer links being established within the Bill between school opening/closing times and for education providers to seriously consider ways in which parental freedom of choice does not dictate large movements of schoolchildren. Simply, why are some schools more desirable than others and is the trend towards rationalisation of schools into ever larger units really justified. Public transport does not live in isolation from other social policies. External costs of traffic congestion and pollution include very substantial costs of health provision and are directly related thereto.

In any case whilst the reduction target is laudable it appears only to take account of commuting journeys and not of shopping journeys. Taking account of the continuing increase in car use it might be argued that there will be no net reduction in car use at all in spite of increase in public transport use.

Costs

11.1.2

NFBU would question whether measures such as congestion charging reduce pollution. Evidence emerging from the London experience of congestion charging has apparently shown no measurable reduction in pollution.

11.2.5

Concern is again expressed at the separation of highway and public transport authority for reasons previously stated. A similar comment applies to the dysfunctional split between planning and public transport responsibilities where the former have a clear and often-exercised ability to thwart the good intentions of public transport providers. It is accepted that this may be outside of the remit of this draft Bill but nevertheless it is raised here as a matter of great concern.

Ihm 14 6 04