

## SWITCH (South West Wales Integrated Transport Consortium)

### ***Response to the National Assembly for Wales, Environment, Planning & Transport Committee's Consultation Report on the Policy Review of Public Transport***

#### **Introduction**

SWITCH welcomes the National Assembly's Review of Public Transport and the opportunity to respond to the consultation document. SWITCH endorses most of the recommendations contained in the report. However SWITCH is concerned that these recommendations will be inadequate to achieve the National Assembly and SWITCH's aspirations for accessible, affordable and integrated public transport, because of the deregulated and privatised nature of public transport operations. SWITCH is also concerned that there appears to be no recognition in the report, or the recommendations, of the significance of the location and layout of new developments.

SWITCH endorses the comments made by the Welsh Local Government Association in its separate response to the Committee's consultation document.

#### **Alternative Organisational Arrangements for the Delivery of Improved Public Transport**

SWITCH considers that the option of building and strengthening the existing consortium arrangements **on a more formal basis** using existing powers would work best in South West Wales. SWITCH also considers that the establishment of Passenger Transport Authorities (PTAs) requiring the introduction of primary legislation, either on an all-Wales or regional basis would be inappropriate. SWITCH finds it difficult to imagine that an all-Wales PTA could have developed the community and innovative solutions already in place in the region.

SWITCH also considers that the transport consortia should not focus entirely on public transport issues, important as they are, but should embrace transport in the round, including links with local authority powers and responsibilities for highway, land-use and economic development issues. (See also SWITCH's response to *Recommendations 4 & 5* below).

SWITCH's detailed responses to the individual Recommendations contained in the Committee's Consultation Report are set out below.

#### **Recommendation 1**

SWITCH welcomes the Assembly's commitment to better quality public transport, embracing community transport, rail and other modes, through the development of a **quality kite mark**. SWITCH believes however that for such an approach to be successful further detailed work needs to be undertaken on an all-Wales basis to establish the following aspects:

- (i) **The development of appropriate common quality criteria** for each public transport mode that recognise the inherent characteristics of each mode and their applicability to both urban and rural situations;
- (ii) How these criteria should be linked to quality partnerships and contracts for bus services and other conventional public transport and codes of practice and service level agreements in the community transport sector;
- (iii) **The development of an appropriate organisation for accreditation purposes.**
- (iv) How enforcement of the operation of local bus services by the Traffic Commissioner can be made more effective.

## **Recommendation 2**

SWITCH welcomes the Assembly's recognition of **historic under investment in public transport**. Whilst the Assembly appears to have addressed the issue of capital expenditure through its Transport Grant spending proposals, the following issues in relation to **revenue expenditure** need to be addressed;

- (i) **The need for increased expenditure to maintain public transport infrastructure, both existing and new;**
- (ii) **The need to establish a contingency revenue support mechanism to secure bus services no longer considered by the bus companies to be commercial, but providing social and other needs;**
- (iii) **To examine whether the existing "Local Services Grant" can be widened to embrace (1) and (2) above.**

## **Recommendation 3**

SWITCH broadly welcomes the points set out in this recommendation. However SWITCH draws the Assembly's attention to the following projects currently underway in its area and some concerns about the development of bespoke school bus fleets and long distance coach provision:

- 1. Concessionary Fares** – The SWITCH partners already have in mind the possibility of developing the current bus based schemes to include community transport and taxis, possibly using smartcard technology and the development of taxicard schemes;
- 2. "All Mode" Information Centres & Community Transport** – SWITCH is already developing proposals for Demand Management Centres which will embrace all public transport modes including community transport. Pilot centres are planned for Pembrokeshire and Carmarthenshire using Transport Grant funding. These centres will be linked and have access to information from the PTI Cymru call centres;

**3. Interchanges & Park and Ride Facilities** – The SWITCH partners are already developing and plan to enhance a number of facilities in Port Talbot, Neath, Swansea, Carmarthen, Haverfordwest, St. Davids and Tenby. Further interchange development is planned in smaller urban centres and in rural areas through SWITCH's bus focal point, rail access and rural bus corridor programmes;

**4. School Transport Demonstration Project** – Whilst SWITCH welcomes initiatives that are designed to improve the safety of school children, it is concerned that this should not be done at the expense of its broader transport coordination and integration objectives. Many school children, particularly in rural areas, are conveyed to school on local services and on vehicles designed for use elsewhere on the bus network. These vehicles have, and will need to have under the Disability Discrimination Act, facilities to permit easier access by disabled people. The development of a second bespoke network of "American Yellow Bus" services aimed specifically at school children would have the following detrimental effects:

- (i) to further undermine the viability of the rural local bus network leading to higher local support costs or the loss of services for the public at large;
- (ii) to reduce flexibility in the deployment of the bus fleet for other public transport needs;
- (iii) the introduction of a second bespoke bus fleet, which would not be available or provide access for disabled people.

**5. Long Distance Coach Provision** – The following issues need to be addressed:

- (i) the need to develop a national strategy that seeks to clarify the role of coach services as part of an integrated public transport policy, viz.:
  - (a) the role of bus, coach and rail passenger services and the issue of potential competition versus feeder services;
  - (b) the role of the planned coach feeder services to railheads;
  - (c) the role current commercial coach services, particularly those operated by the National Express Group;
  - (d) the desirability of co-ordinating coach services with local bus services;
- (ii) how best to develop a partnership approach to the development of coach services within the chosen strategy.

#### **Recommendation 4**

SWITCH welcomes the **development of a regional public transport strategy** approach, but considers that it should be developed as part of an overall transport strategy. SWITCH is already preparing such a strategy. It has already identified a core public transport network and intends to develop this strategy by 2003. SWITCH considers that these regional strategies should be well dovetailed with the Local Transport Plans developed by the Consortium partners.

#### **Recommendation 5**

SWITCH agrees that **regional transport strategies should guide decisions on funding** and is already putting in place procedures for monitoring the success of achieving its aims through Policy Agreements with the Assembly, best value and routine monitoring on a regional basis. SWITCH's current Transport Grant bid for corporate funding includes an element for monitoring. Decisions on funding should be guided by the full range of plans in place at Local, Regional and National levels. Transport is critical to meeting the aims and objectives across a wide range of functions and services. Regional Transport Strategies and Authorities' own Local Transport Plans should carry their own appropriate weight in investment decisions.

#### **Recommendation 6**

SWITCH welcomes further discussions with the Assembly on **how objectives in its regional public transport strategy will be delivered**. SWITCH has already reflected the Local Transport Plan Strategies of the partners in its bids for Transport Grant and is addressing the issue of cross border travel patterns through its urban and rural bus corridor development programmes and regional rail and freight studies.

#### **Recommendation 7**

SWITCH agrees that there is a need to **develop more robust regional consortia building upon existing arrangements** and is already developing a formal partnership constitution for itself, which it is anticipated will be in place later this year. However it considers that these more robust consortia should embrace all forms of transport and not just public transport. SWITCH considers that in this way it is well placed to deliver better public transport by exploiting and developing the links with its other highway, transport, land-use planning and other related powers and responsibilities.

#### **Recommendation 8**

SWITCH would welcome further consultations with the National Assembly about the **possibility of using existing legislation to place consortia on a more formal basis**. However it considers that the establishment of a PTA in the SWITCH area is not the best way forward, both for the reasons set out in relation to *Recommendation 7* and because its establishment would require the

introduction of primary legislation. Its establishment would also be expensive and distant from local public transport needs. In SWITCH's view many of the current local public transport initiatives set up in each of the SWITCH partner authority areas would not have been developed through a centralised PTA organisation. This view is fully consistent with that expressed by the Welsh Local Government Association and SWITCH in their response to the Assembly's Transport Framework for Wales document earlier this year.

### **Recommendation 9**

SWITCH welcomes the opportunity to examine **with the National Assembly how closer working links could be developed.**

One possibility is that appropriate Assembly Officers sit in on SWITCH meetings as observers.

### **Recommendation 10**

SWITCH wishes **to raise the profile of its activities** and has developed its own logo with which it intends to "brand" its publicity in terms of a Newsletter, information leaflets and roadside information. It intends that this publicity should be of a high quality and be displayed along the urban and rural bus corridors being developed and elsewhere. This approach could be linked to the **quality kite mark** approach set out in *Recommendation 1*. Consequently SWITCH's current Transport Grant bid for corporate funding includes an element for consortium publicity.

### **Recommendation 11**

SWITCH recognises that there is scarcity of financial resources to develop future transport initiatives. Consequently it recognises that there is a need to target available finance where the benefits of investment can be maximised for the community. To facilitate this approach SWITCH recognises **the need to agree with the Assembly an evaluation framework for measuring the benefits of targeted transport investment.** SWITCH therefore looks forward to working with the Assembly in developing such a framework.

### **Recommendations 12 & 14**

5.1.1 SWITCH welcomes the opportunity of both disseminating good practice in terms of project evaluation and learning from experience and results elsewhere. It therefore supports the **establishment of evidence of 'what works in Wales and elsewhere'** as basis for future policy development and implementing more effective transport services in Wales. In addition SWITCH has developed and is planning a number of mechanisms to disseminate good practice as follows:

- (i) The establishment of periodic Smartcard seminars, the first of which took place in Swansea in March this year;

- (ii) The production and distribution of regular SWITCH newsletters;
- (iii) The establishment of an Annual Transport Conference to which AMs, MPs, MEPs, representatives of the transport industry, transport interest groups and adjoining regional consortia will be invited. The first conference is planned for the Spring of 2002;
- (iv) Regular dialogue with the other transport consortia and fora through the South Wales Transportation Officer Group;
- (v) The production and dissemination of high quality publicity material about the work of SWITCH, funding for which comprises part of the SWITCH corporate Transport Grant Bid for 2002/2003.

### **Recommendation 13**

SWITCH believes that compared to rail passenger services, bus passengers are poorly represented in the development of public transport policy. It believes that the interests of bus passengers should be given more expression in future consultative arrangements at all levels throughout Wales. **SWITCH proposes that:**

- Either (i) a similar organisation to the Rail Passenger Committee (RPC) for Wales is set up to represent the interests of bus passengers;**
- Or (ii) the Assembly lobby for the remit of the Wales RPC to be changed to include bus passengers.**

SWITCH therefore supports the view that **passengers are involved in drawing up the evaluation framework** proposed in *Recommendation 11*.