

4 April 2016

Response to Wiltshire Council's consultation on the proposed removal of subsidy for buses.

Summary of main points of the response:

- Bus travel accounts for nearly two thirds of public transport journeys but does not receive a proportionate public sector investment¹
- Bus Services are essential to enable people to access education, employment and vital services
- Home to school transport costs could be cut by the provision of appropriate bus services
- Avoidance of social exclusion reduces the burden on local health and social services and buses are key to this
- Disabled people will be particularly badly affected by the proposals, even more than other vulnerable groups in the county
- Community Transport (in various forms) will not be able to bridge the gaps which would be caused
- The effect on the local economy, congestion and integrated transport options should not be underestimated
- The contribution of the bus to the working of the economy and society is multi-faceted. The bus is not simply a transport mode – it is more than that.

Bus Users has carried out a series of public consultation events across Wiltshire and would be happy to share this research with Wiltshire Council officers and offer some advice on how best to mitigate the effects of any cuts that are proposed for 2018.

Whilst Bus Users is aware that Wiltshire Council has used this consultation to plan for the future, we hope that the local authority will be conscious of any changes to the commercial network in the interim period (the recent deregistration of service 231 being a point in case). Furthermore, changes to schools admissions procedures, permissions granted for new developments, changes to hospital specialisms etc will all need to factor in transport option. Residents have told us that they are concerned that commercial changes coupled with cuts to subsidies may leave many areas without a service.

Who we are

Bus Users UK champions the interests of bus and coach passengers throughout Britain and is the official body to oversee bus users' complaints in England (outside London) Wales and Scotland under the EU Passenger Rights Regulations.

Passengers understand that Wiltshire Council, like every local authority, is required to make substantial savings in the current climate. However, it should be noted that bus travel accounts for

¹ Transport Statistics Great Britain

nearly two thirds of public transport journeys but does not receive a proportionate public sector investment².

Prioritising savings is always going to be a difficult job. But when deciding those priorities it needs to be considered that bus services are not simply a dispensable luxury. Bus services are essential to enable people, including those on low incomes and with disabilities, to:

- Access employment
- Access education
- Access health services
- Get to shops
- Avoid isolation and social exclusion
- Enjoy a greater degree of well-being

The first three of those requirements are always at the top of local authority spending priorities, and removing bus services risks people losing access to those essential services.

Bus services can access shopping centres in an environmentally-friendly and more effective way than the private car, and bus users contribute to the high street economy in a way which is often underestimated. Removing access to bus services and thereby denying access to local retail centres to people without private transport is likely to stifle economic growth.

Avoidance of social exclusion and encouragement of well-being can often reduce the burden on local health and social services and enable more active citizenship.

Even for those able to afford to run a car, bus services can provide an alternative which is sustainable and can provide better access to town centres, alleviating congestion at peak times and on minor or busy roads.

Impact of proposals on access to Education & Employment

Feedback from our events shows a large reliance on taxis for home to school transport in communities which could benefit from a bus service. Home to school transport is one of the biggest parts of a local authority's transport budget and many of these costs could be avoided by providing an adequate bus service. Getting children and young people onto a local bus service increases their self-reliance and independence, gets them used to travelling by bus, increases activity levels (which decreases childhood obesity thereby decreasing the impact on the NHS), reduces congestion and encourages young people to think about the bus as a sustainable future source of transport. Bus Users UK would urge the council to consider the requirements of Section 63 of the Transport Act 1985 to provide 'socially necessary' buses by reallocating a proportion of this budget to subsidise bus services in order to meet this need.

Unfortunately there is little evidence to show that reducing or withdrawing subsidies would result in the provision of replacement commercial services.

In 2014, research showed that the average education cost per pupil in the UK was £807. This does not include children with Special Educational Needs for whom the cost was £4366 per pupil.³

As many schools and colleges become specialised academies, an increasing trend, students need to be able to travel to different sites in order to study their field of interest (e.g. young people travelling

² Transport Statistics Great Britain

³ 2014 ATCO Benchmarking Survey

from the north of the county to Salisbury UTC). The removal of subsidy for bus services forces students to accept whatever course is available at their local educational establishment rather than allowing them to develop their specific interests and skills into possible career paths. There was concern in the feedback Bus Users received about the access to these specialist educational establishments given that students have already made their choices (and received confirmation of them) for September. Many students have been responsible in choosing schools and colleges that they can access by public transport, thereby negating the need for parental or their own private transport. It would be in all our interests to encourage these young people to see public transport as a long term solution. Furthermore, it should be remembered that many sixth form or college students do not follow usual school day patterns and whilst Wiltshire Council may consider retaining some school journeys, the authority should consider how such students will be accessing their education.

Parents and carers of young people at St John's in Marlborough are concerned because there are many students who rely on service buses, e.g. those from out of catchment, sixth formers and all those who take part in after-school clubs use the school coach services. St John's is one of the many schools in Wiltshire which is increasingly getting students from out of catchment because of its reputation. This is a consistent concern across the county.

Young people reliant on home to school transport cannot take part in extra-curricular activities and cannot therefore broaden their horizons as easily as their urban counterparts. These extra-curricular activities will often make a difference to an employer when noted on a personal statement or CV.

In the recent elections for Members of the Youth Parliament in Wiltshire, some of the candidates highlighted the lack of bus services and also the cost via their manifestos. This is clearly a concern for the young people of the county. One candidate, in particular, campaigned for transport to school to be free until 18 (given that the mandatory education has risen). He is also campaigning for the adult age on public transport to be raised to 18. Others mentioned climate change and the impact of pollution in their manifestos

Access to opportunities for work experience also decreases and puts young people based in suburban and rural areas at a distinct disadvantage to their peers living in urban areas. Wiltshire's Children and Young Peoples' Plan should recognise the importance of providing access for young people to further education and employment along with independent access to social and recreational activities.

Entry level jobs tend to involve unsocial hours and weekend travel so anything which would impact on people's ability to access employment needs careful consideration if it is not to have a deleterious impact on the ability of employers to find and retain local staff. Wiltshire has a big tourist industry but this, too, is a sector which often involves unsociable hours and low pay. If cuts are made to services, many of these employees will have to change their jobs or become unemployed.

Job seekers in Marlborough, for example, have to go to Devizes or Swindon as do young people looking for further education.

Should the plans to amend Sunday trading laws go forward, this will result in extended opening hours but staff will not be able to access their places of employment if further cuts are made to bus services.⁴

Many of the local schools use the buses to access other services. For example, the primary school at Ogbourne St George uses service buses once or twice a week for days out to Marlborough or Swindon, including visits to the library and to their secondary school, St John's. This is a good example of encouraging children from an early age to think about sustainable travel solutions.

Impact of proposals on access to Health and Social Care services

Decreasing access to buses will increase the burden on other parts of the council's budgets such as social services who will have to deal with more cases of depression and anxiety, adding to the workload of the NHS. Access to community groups provides help and support upon which the NHS and social services currently rely and the removal of that access would cause additional burdens on child and adult social care budgets.

If the proposals were to proceed as suggested, many residents of Wiltshire would not be able to attend morning or late afternoon medical appointments due to the lack of appropriate bus services. This would have a knock-on effect on consultants' appointments, potentially affect surgery and theatre availability and putting more stress on the shift patterns of doctors and ancillary staff. Many of Wiltshire's residents are sent to out of county hospitals for NHS services (e.g. Bath and Swindon hospitals). Residents feel that reducing the frequency on the Devizes town service from every half an hour to two or three services a day will cause major problems for those wishing to access the treatment centre, the psychiatric unit and the X-ray centre which are all along this route.

As the UK's population ages, the requirement for care staff to visit clients' homes will increase. Without bus services to support these vital care-givers, clients will be forced into a care home system which is already straining at the seams

The "Later life in rural England"⁵ report by Age UK is a wide ranging assessment of the challenges facing older people living in rural areas, with lack of transport identified as a major issue given that 35% of older households do not have access to a car. The transport chapter highlights the importance of regular, convenient and reliable bus services to the lives of older people in rural areas, and identifies reductions in service as a serious concern, impacting on all aspects of their lives. It calls on local authorities to recognise the wider value of bus services in preventing social isolation and to base funding decisions on impact assessments and not just costs and the number of people using a service.

Wiltshire Council has forecast a growth in population over the next 10 years of 7.2%⁶. There will be a 35% increase in the population over 70 between 2016 and 2026 with those over 70 representing 18% of the population by 2026. A bus network will provide a cost-effective way to support these demographic changes.

Many community transport options are limited by eligibility criteria, range, times and availability of volunteers. While they can make a valuable contribution to the overall transport plan, it cannot be

⁴ <http://www.theguardian.com/business/2016/feb/02/government-plans-amend-sunday-trading-laws?>

⁵ www.ageuk.org.uk/herefordshireandworcestershires/campaigns-and-events/later-life-in-rural-england

⁶ <http://www.intelligenzenetwork.org.uk/population-and-census/>

expected to meet all the needs of residents, whether to make an onward travel connection, to get to a large town or city, to visit relatives in care or to attend a medical appointment.

Impact on housing

The additional erosion of rural communities if public transport is decreased should also be noted in the wake of closures of libraries, post offices, GP surgeries and in some cases, local schools as a result of centralisation. Many people moved to these rural areas on the basis that there was a bus service to access hospitals, shops etc. as they became less able to drive. If transport links are cut, there will be an inevitable movement of people towards urban centres. Given the lack of social housing in urban environments in the county, this shift will add to the workload of the housing departments in local authorities and increase the burden on housing associations.

Planning permission has been granted for a number of social housing and warden assisted developments in the more rural areas of Wiltshire (e.g. on the Burbage/Salisbury Road and in Barton Park just outside Marlborough) but there seems no clear indication of how the residents are to access that housing and related facilities. Bus Users would urge local authorities to investigate the use of funding such as the Community Infrastructure Levy to support new bus services to these areas and to encourage home owners to think about the bus as a sustainable and reliable source of transport. Without early attention to public transport options, every development of 1,000 homes could lead to up to 4,000 additional cars on the road, adding to the congestion problem on smaller roads.

Impact of proposals on disabled residents

As of January 1st 2016, all single decker buses must be DDA compliant, and this means that passengers with a disability can have confidence that, for the most part, their end-to-end journey will be accessible. This should mean that their opportunities have significantly increased, but if there is no bus service where they live, the accessibility changes are meaningless.

The DWP has set up centres around the county which specialise in disability work exemption assessments. Many of these centres rely on their clients being able to access their services by public transport as many of these people, by nature of their disability, will not be able to drive

It may also be worth noting that independent research by Scope suggests that 2 out of 3 wheelchair users have been overcharged by taxis because of having a wheelchair.

Impact of proposals on local economy

In many parts of the county, market days are important trading days for those communities. To reduce the number of customers available to these market traders will have a far-reaching effect on the economies of those communities but also the livelihood of the traders. Devizes has the biggest market in Wiltshire and traders are very concerned at the impact of cuts to bus subsidises. As over 90% of Marlborough's bus services are subsidised, the traders there are understandably anxious.

Removing bus services will also prevent people from attending cultural social events. The impact on theatres and cinemas in smaller communities and even city centre environments such as Salisbury, Swindon and Bath will be far-reaching. Many residents have stated that, whilst they may be able to get to evening events, they will not be able to get home and the cost of a taxi makes the evening prohibitively expensive.

High street shops already struggle to compete and removing the shopping option from a significant proportion of the county's residents will inevitably have a damaging effect on the local economy.

Many of the more rural areas of Wiltshire are home to tourist attractions (Longleat), countryside and canal walks (Caen Lock), caravan parks and historic sites (such as the White Horses, Stonehenge and Avebury). These are vital both to the economy of the county and its reputational value as a holiday destination.

Highlights from the “Buses and the Economy II”⁷ report written by the Institute for Transport Studies, University of Leeds in July 2014 and commissioned by Greener Journeys and the DfT, show:

- There is a significant relationship between accessibility by bus and employment.
- People in urban areas who are currently unemployed and seeking work depend heavily on the bus for access to employment.
- The bus is a vital artery for shopping trips. Bus has the largest market share (one third) of retail/expenditure trips to city centres.
- The bus has an important social insurance dimension. This is the value of having the option available of using the bus, plus any social or community value buses have on behalf of others.

Environmental impact

The National Planning Policy Framework⁸ states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

The “Creating Growth, Cutting Carbon”⁹ white paper recommends offering people sustainable transport choices, that will stimulate behavioural change.

The Door to Door Strategy¹⁰ builds on the “Creating Growth, Cutting Carbon” white paper by setting out the Government’s vision for an integrated transport system that works for everyone and making journeys by a sustainable means an attractive option. The benefits of the strategy’s approach are:

- Protecting the environment- by increasing the use of sustainable transport to help cut carbon emissions and improve air quality.
- Boosting economic growth – by improving connectivity and interchange and cutting congestion to help link businesses and markets
- Supporting society – by providing a well-connected and accessible transport system that is safe and secure to help improve public health and the quality of life
- Deliver a good deal for the traveller - by integrating the door-to-door journey as a whole to help make travel more reliable and affordable.

Buses offer a clean, green, flexible, accessible and affordable means of making the county’s transport plan sustainable and environmentally-friendly and could aid the achievement of environmental targets if placed at the heart of Wiltshire’s transport policy.

Reliance on Community Transport

⁷ www.greenerjourneys.com/2014/07/buses-economy-ii

⁸ www.gov.uk/government/publications/national-planning-policy-framework--2

⁹ www.gov.uk/government/publications/creating-growth-cutting-carbon-making-sustainable-local-transport-happen

¹⁰ www.gov.uk/government/publications/door-to-door-strategy

Solutions involving community transport, or using taxis, demand-responsive transport and so on to reduce the cost of individual journeys to more remote locations, can be non-inclusive. Many of the community transport schemes already in use across the country operate under Section 19 permits which limits their use just to members of the scheme. Use of Section 22 permits enables community transport to benefit the whole community and to enable people to make journeys spontaneously. This may well reduce the cost savings somewhat but will give greater benefit. Greater value could also be attached to bus services in some parts of the county by effective marketing; many of the routes affected are scenic and could be attractive for leisure travel if properly marketed.

Our research suggests that more people would like to see more money provided to local bus routes rather than encouraging reliance on community transport which is perceived as far less convenient and does not go where people necessarily want to be. Community Transport removes the 'impulse purchase' element of bus services and implies that everyone is able to plan their lives at least 24 hours ahead (in some cases three days in advance). This particularly impacts on those living with or caring for someone with progressive illnesses or mental health issues whose ability to go out cannot be taken for granted from one day to the next. There are also concerns that, should more bus services be removed, Community Transport services would not be able to deal with the demands.

Passengers with learning disabilities or dementia will struggle to remember to book a service ahead. Removing regular bus services is taking away that routine which many people have come to learn as part of travel training. All the money spent on travel training Wiltshire residents to enable an independent life will be wasted

Many of the people who can give up their time for driving duties are of a certain age and unsure as to how long they will be able to drive. There are concerns over insurance, DBS formalities and the burden of the responsibility of carrying people who are not known to them. Many volunteers, just by the nature of the person they are, already have many other volunteering commitments.

Local Authorities are increasingly relying on third sector organisations to provide services, using a combination of staff and volunteers to do so. Cutting bus services could mean that many volunteers will no longer be able to undertake those duties.

Impact of proposals on integrated travel

The proposed cessation of subsidised bus routes would have a serious impact on those areas without a rail network or where the bus is heavily relied upon as part of an integrated transport solution. This would represent a very real loss of public transport availability and connectivity.

For example, connections to Bedwyn, Hungerford, Salisbury and Swindon would be affected. Marlborough is a town which relies heavily on the rail links at Bedwyn, Hungerford and Swindon. Services to Bedwyn and Hungerford are already few and far between and services to Chippenham, which also has a train station, no longer exist. The east to west bus offerings in the county are also very poor.

Many Wiltshire towns serve as hubs for onward travel. If Wiltshire Council is minded to change the frequency of services, Bus Users suggests that priority is given to transport interchanges in order to minimise the inconvenience to the passengers and ensure that frequencies do not drop to a level which makes the whole journey unachievable.

Marlborough, in particular, suffers with a lack of links to other strategic towns in Wiltshire such as Chippenham and Devizes. There are bus options involving a change but these take three to four times the time that it takes in a car. Whilst bus passengers expect the bus to be slower, making it four times that of the car will not make it attractive to car users.

There is a fear that making some links even harder will encourage people to use their cars. For example, the bus from Tisbury to Shaftesbury involves two or three buses via Salisbury. The bus from Tisbury is at 10:36 and passengers arrive home at 18:45 having only spent two hours in Shaftesbury, despite it being less than 10 miles each way.

Impact of proposals on the future sustainable growth of public transport

Bus use is highest amongst those aged 17-20 and 60+ and bus use in the South West has actually increased.¹¹

Bus Users UK would like to see young people wanting to continue to use the bus longer term rather than automatically considering a driving licence as soon as they can. Furthermore, Bus Users UK would like to encourage local authorities to implement schemes to encourage young people to use the bus, such as the Welsh Government's young person's discount¹² and discounts for those in full time education.

The Equality Act 2010

From 5 April 2011, s.149 of the Equality Act 2010 extended the duty of authorities in respect of people suffering any of the "protected characteristics" of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation - to any "public authority".

The Act requires that every public authority must, in the exercise of its functions, have due regard to the need to "remove or minimise disadvantages suffered by people who share a relevant protected characteristic" where the disadvantage is connected to that characteristic, to the need to "meet the needs of people who share a relevant protected characteristic" where those needs are different from the needs of people who do not share the characteristic, and to the need to "encourage people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such people is disproportionately low".

It would be difficult to see how the removal of bus service subsidies would not contradict the requirements of this Act.

The consultation

Bus Users UK would like to commend Wiltshire Council on engaging with Bus Users UK from the start of the consultation and also meeting the Sedley criteria, i.e. the four basic requirements which are essential if the consultation process is to have a sensible content. We look forward to an ongoing engagement with Wiltshire Council with regards to the provision of bus services.

- i. ***Be undertaken at a time when proposals are still in a formative stage.***
Wiltshire Council has advised that the changes are planned for 2018 and therefore this consultation is part of that forward plan.
- ii. ***Include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response.***

¹¹ DfT Local Bus Statistics 2014/15

¹² <https://mytravelpass.gov.wales/en/>

The consultation document was very descriptive about where the current costs lie and the various options it is considering. One criticism from some consultees was that the document was perhaps too detailed and made heavy reading.

iii. ***Adequate time must be given for consideration and response.***

The consultation ran from 11 January to 4 April – a total of 12 weeks. The time and publicity given to the consultation has resulted in over 10,000 questionnaires being returned, representing a 2.5% response rate of the population over 15. There have been some comments about certain bus services not having the notices on board and certain stops having information about services in a different area of the county.

iv. ***The product of consultation must be conscientiously taken into account in finalising any proposals.***

The Cabinet meeting is not planned until the summer of 2016 giving officers and councillors the opportunity to digest the information which has been gathered. We would like to extend the thanks of residents in both Dorset and Wiltshire to Wiltshire Council for their intervention with the possible removal of the cross-county X12 service from Blandford Forum to Salisbury. This intervention has resulted in the new service 20 meaning that people do not have to change jobs, schools and hospitals etc.

Residents have requested that any money raised from an increase in council tax to fund bus subsidies as mooted in Question 22 of the consultation suggesting it should be ring-fenced for that purpose.

We note that Wiltshire Council hasn't bid for the Sustainable Travel Transition Year Fund for the forthcoming financial year¹³, but is looking to bid for the access fund for the following year which may provide some help in resolving some of the issues in providing bus services across the county.

Some comments from the Your Bus Matters events (held across Wiltshire in January, February and March 2016). These are comments recorded from your residents and do not represent the view of Bus Users UK.

- The proposal to stop the X12 which would have life changing implications for a lot of people.
- Cuts to the service such as are being suggested have the potential to cause untold damage to the quality of life for the people who live in Chiseldon.
- These cuts will add to the congestion and pollution in Swindon and other places.
- People need to get to work.
- Bus services are essential to a civilised world.
- Bus cuts will remove contact with the outside world.
- Council tax increased in Wiltshire but services have decreased.
- Villages will only be for those with cars.

¹³ "Wiltshire Council has considered making a bid to the Government's £20 million 'Sustainable Travel Transition Year 2016/17 Fund'. However, given the very tight timescales, the requirements of the bid, limited resources and the failure of the Council's 2015/16 Local Sustainable Transport Fund bid extension, it has been decided that the Council's efforts are better targeted at making a bid to the £560 million Access Fund which the Dept. for Transport is to launch later in 2016 for commencement in 2017/18. As part of this process, the Council will engage with relevant key partners and community groups to seek to develop the best bid possible" (Facebook, 16th March)

- Services need to be hourly at least in order to make it an attractive proposition.
- Need to think about onward travel to Salisbury and Swindon.
- Devizes will become more polluted than it already is.
- My daughter would have to give up work as I wouldn't be able to provide her childcare.
- The Saturday morning town bus in Marlborough is really important as it's market day and the bus is a community event.
- We need buses to meet the later trains at Bedwyn.
- Please don't cut the 70A or 72A back from Swindon – they are so important to us.
- Two hourly services would affect people going to the hospital.
- I love my buses.

PLEASE NOTE: Bus Users has carried out a series of public consultation events across Wiltshire in the last couple of weeks and would be happy to share this research with Wiltshire Council officers and offer some advice on how best to mitigate the effects of any cuts that do go ahead.

FURTHER INFORMATION

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