

# LOCAL BUS SERVICES IN SCOTLAND

Response to Scottish Government consultation

5 December 2017

## 1. About Transform Scotland

We are Scotland's alliance for sustainable transport. We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered charity, politically independent and strictly science-based. We are a registered Scottish charity (SC041516).

## 2. Introductory comments

Transform Scotland welcomes the consultation on local bus services for the reasons set out in the Minister's Foreword to the consultation document. Bus services are essential for the people of Scotland with around three-quarters of all public transport journeys being made by bus. However, bus services face significant challenges, with passenger journeys decreasing and service cuts. We agree that the legislative framework governing bus services needs to be updated.

As the consultation indicates, the bus industry is as varied as communities it serves. It differs even between apparently similar areas. Whilst the Scottish Government needs to take the lead, it cannot impose universal solutions. The task is to create the conditions in which bus patronage can grow, reflecting local needs.

## 3. General comments

We fully agree with the consultation document on the importance of bus services; indeed we consider that they are essential. We fully agree that the long-term decline in passenger numbers is a problem, for the reasons set out in the document; and that this trend must be not just halted but reversed.

However, the analysis of why passenger numbers (and services) have declined is limited, with references scattered throughout the document; whereas it should be central. Nevertheless, it is evident that:

- Paragraphs 2.25 to 2.28 identify declining revenues from passengers and government sources, against a background of rising costs.
- Paragraph 4.4 notes increasing car ownership; the recent low cost of car use, and in some cases parking; national lifestyle changes such as online and out of town shopping.
- Paragraph 4.5 notes the importance of congestion and its impact on journey times, reliability and costs.
- 4.12 notes that information is not consistent and can be poor.

Conversely, the document notes that bus passenger satisfaction scores are high but have reduced in recent years, particularly in relation to punctuality and reliability.

As the document notes, the decline in patronage is unevenly distributed, with growth in the Highlands, Islands and Shetland, a small increase in the South East, but decline in the South West & Strathclyde, the North East, Tayside and Central. It would be instructive to examine this imbalance. This research should form part of the next stage of the process.

Nevertheless, the document is primarily concerned with the regulation and ownership of buses. It appears to argue that this would address a perception among local transport authorities, and perhaps the wider public, that changing the regulatory and ownership regime would reverse declining passenger numbers. It does not set out why this would in fact be the case (or challenge that view), or what a different regime would actually do, but seems to accept this perception at face value.

Given the significant factors (set out above) behind the decline in ridership, there is a significant risk that these underlying factors will remain unaddressed. We are concerned that five or more years of time and resources could then be spent on reorganisation, instead of tackling the fundamental problems cited in the document.

## 4. Future legislation

We accept that there may be a case for allowing local transport authorities greater freedom to own, operate or regulate bus services in their area, if they see fit. However, as indicated above, this is not set out convincingly. The question that must be asked before local authorities may own, operate, franchise or regulate bus services in their area is: what level of service do they want, and how would any change deliver that service?

This begs the question of whether service standards should be established. There is a risk that formal standards lead to manipulation of services to meet targets rather than actual need, and the creation of a bureaucracy to monitor them. Nevertheless, unlike other sectors such as the NHS or railways, there is currently no mechanism to define a reasonable service, or whether it is being met. As illustrated above, this makes it difficult to compare services in areas where ridership is increasing against those where it is decreasing. We therefore suggest that the Scottish Government sets out an indication of, for example:

- Desirable network coverage, operating hours, frequencies, fares.
- Fleet environmental standards.
- Cleanliness.
- Personal security.
- Customer care.

We note that the Traffic Commissioner already has responsibilities in respect of reliability.

Given the need for services to reflect the diversity of communities served, some standards would be more or less demanding depending on whether an area is, for example, urban or rural. They would therefore be tailored at local level within the national framework. Any standards should be minimum not maximum, and are likely initially to be benchmarks rather than requirements.

However, rather than being preoccupied with organisational issues, future legislation must have a much stronger focus on addressing the following, which the document itself recognises:

1. Congestion and its impact on journey times, reliability and costs.
2. The impact of parking.
3. The impact of lifestyle changes e.g. online and out of town shopping. We would add potential future disruptive technologies (e.g. driverless cars).

4. The relative low cost of car use.
5. Declining revenue from government, against a background of rising costs.
6. Declining revenue from passengers.

We urge the Scottish Government to consider how these issues can be addressed in forthcoming legislation – as the consultation documents pay little attention to them. While this might require a programme of further research, much of the data is already in the public domain. In particular, we would refer the Government to the recent research by KPMG, published in November 2017.<sup>1</sup>

Point 6, above, is essentially a consequence of the other factors; we simply note that if ridership increases passenger revenue will almost inevitably follow.

The information we gather from operators is that congestion is the biggest single issue for the industry. It is a significant problem for passengers, too, although they tend to express it in terms of extended and unreliable journey times. As the document sets out, it has a direct impact on costs, and hence fares. We believe it affects even 'rural' bus services (although there may be little empirical data) where an urban area forms part of the route. There are two strands: roadworks and traffic volumes.

The roadworks strand arises from the unpredictability of some roadworks, their duration, the volume of roadworks, and the lack of provision for buses when they take place. We understand that the Scottish Government will shortly make an announcement on the powers of the Roadworks Commissioner. That will be a suitable locus to address these issues.

Congestion arising from increased traffic volumes reflects local authorities' reluctance to progress or develop new bus priority measures, and a lack of enforcement of existing priorities. It appears that over the last decade and a half, few or no new bus lanes have been installed in Scotland, notwithstanding the growth of general traffic; indeed, in Edinburgh their operating hours have been reduced. This may reflect timidity on the part of councils (bus lanes can be controversial, particularly where road space conflicts are greatest) and the increasing cost of installing new lanes (which, ostensibly, should not be expensive, but which is in practice).

It may be the case that councils now prefer less visible priority measures, such as at traffic signals. Whilst valuable, these do not send the clear message that a highly visible bus lane does. We also note a lack of commitment to maintaining bus lanes, which also sends out a message that they are not valued. At this stage of the legislative process we do not set out specific measures to encourage the development of bus lanes, but it is likely to involve simplifying and reducing the cost of doing so, so that it is at least no more difficult and expensive than withdrawing or descopeing them.

Poor enforcement of bus lanes (and other infrastructure) means that infringement by a single ineligible vehicle can significantly affect journey times; few lanes are not infringed at some point. Static bus lane cameras are useful, but need either to be much more numerous, or to be complemented by on-bus cameras (a well-established technology). If these are constrained by current legislation, this needs to be rectified at an early date. Bus stop clearways (and other TROs at bus stops) also need to be enforced.

Decriminalisation of the enforcement of bus lanes may need to be considered, so they can be enforced by parking attendants. However, this is potentially a complex issue requiring careful examination, and we would therefore prioritise the measures set out above.

The impact of parking (aside from uncontrolled on-street parking, as discussed above) can be considered alongside that of lifestyle changes e.g. online and out of town shopping. This is partly a component of land-use planning, and is therefore best addressed in that context. We simply note at this stage that the availability of large volumes of free/cheap parking is a disincentive to

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<sup>1</sup> Trends in Scottish bus patronage; 2017, KPMG

public transport use. In town centres, there is often a perception that it is 'essential' for local business, although there is substantial evidence that the importance of public transport is underestimated by those businesses.

The impact of future disruptive technologies is, by its nature, difficult to predict. However, it warrants greater consideration than is evident from the consultation document. The prevailing view appears to be that they pose a significant threat to the bus industry. This may be true, in which case government should lead debate on how to protect bus services. However, they also present opportunities, as in some elements of 'Mobility As A Service' concepts; these imply a future in which car ownership declines, with much greater flexibility of modal choice. This warrants further examination.

The other component of bus industry decline is the declining revenue from government, against a background of rising costs. If the Scottish and local governments adopt the right measures, rising passenger numbers will mean the industry needs less financial support; this is the preferred scenario. The factors behind rising industry costs appear (except the cost of congestion) to result from issues which are not unique to the industry, and therefore we focus on revenue.

We have responded to the separate consultation on the concessionary travel scheme, and therefore simply note here the relationship between that scheme and industry revenue; it is surprising that the two consultations are not more closely linked (although we agree that the scheme is intended primarily as a benefit for individuals, not for operators).

The document notes that almost half of operator revenue comes from Local or Central Government; but in real terms this funding is now 5% lower than five years ago (whilst passenger revenue is static). It is therefore not surprising that bus services are declining and fares rising in the absence of measures to encourage passenger revenue growth.

The Scottish Government has intervened in the price of ferry travel (i.e. through the Road Equivalent Tariff) and has significantly grown ferry usage; and argues that intervening in the price of air travel (i.e. through a proposed cut to Air Departure Tax) will significantly grow air travel (although Transform Scotland disagrees with its approach to the latter). It cannot therefore have any objection in principle to intervening in the price of bus travel.

We broadly support the proposals to improve information by building on voluntary arrangements with provision to require operators to provide information on routes, timetables, punctuality and fares. We look forward to more detail. Furthermore, Traveline Scotland is an excellent service, but perhaps suffers from low public awareness. There should be a clear commitment to resourcing it fully. Finally, given the often negative image (and misperceptions) of bus services,<sup>2</sup> a new approach to marketing is needed.

We will respond separately to the consultation on smart ticketing, simply noting here that the objective should be to make it easier and cheaper to change buses, including those operated by different companies.

## 5. Conclusion

We do not disagree with the underlying theme of this consultation, which is that local authorities, if they see fit, should be given more powers over bus services in their area, although the case for and against needs to be explored in more detail.

However, we are seriously concerned that the consultation is a missed opportunity to address the factors underlying the long-term decline in bus use. The risk is of legislation which fails to tackle these factors, resulting in a preoccupation with re-organisation, while patronage and services continue to decline because the fundamental problems are not addressed.

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<sup>2</sup> Understanding why some people do not use buses; 2010, Scottish Centre for Social Research.

We urge the Scottish Government to:

- Set out its aspirations for service levels, including network coverage, operating hours, frequencies, fares, environmental standards, cleanliness, personal security and customer care.
- Examine why patronage trends differ across Scotland, and lessons which can be learned from them.
- Set out the reasons for long-term decline, and remedies to address this (e.g. traffic management, bus priority measures, and enforcement of bus priority measures).

## 6. Appendix

Across Europe, between 2004 and 2014 the relative use of passenger cars was stable at between 83.0 - 83.7 % of all travel. Train use rose from 6.7 % to 7.6 %. Coaches, buses and trolley buses were down from 9.9 % in 2004 to 9.1 % by 2014 (mostly declining between 2008 and 2009).<sup>3</sup>

### % of total inland passenger/km 2014

	Car	Coach/bus/ trolley bus	Train		Car	Coach/bus/ trolley bus	Train
EU-28	83.4	9.1	7.6	Luxembourg	83.6	12.2	4.3
Turkey	64.9	33.5	1.6	Croatia	85.1	11.9	3.0
Hungary	67.5	22.6	9.9	Slovenia	86.3	11.6	2.1
Czech Republic	73.1	18.5	8.4	Iceland	88.6	11.4	-
Cyprus	81.8	18.2	-	Lithuania	88.2	10.8	1.0
Greece	81.4	17.7	0.9	Spain	83.2	10.3	6.5
Ireland	79.8	17.3	2.9	Austria	77.6	10.3	12.1
Bulgaria	80.4	17.1	2.5	Denmark	80.0	9.9	10.1
Malta	83.1	16.9	-	Finland	85.2	9.8	5.0
Estonia	81.6	16.5	1.9	Sweden	84.7	6.4	8.9
Belgium	76.8	15.5	7.7	Portugal	89.8	6.1	4.2
Slovakia	77.4	15.2	7.3	Germany	85.7	5.9	8.5
Latvia	80.9	14.9	4.1	France	85.1	5.6	9.3
Poland	79.9	14.3	5.8	UK	86.1	5.4	8.5
Romania	81.7	13.5	4.8	Norway	89.8	5.4	4.9
FYR Macedonia	85.6	13.5	0.9	Switzerland	77.7	5.1	17.3
Italy	80.8	12.9	6.3	Netherlands	87.0	3.3	9.7

The UK is at the lower end of bus use, as are countries of similar population, area and wealth (Germany, France, but not Italy and Spain) and smaller, but similarly prosperous Norway, Switzerland and the Netherlands. There is little evidence that low bus use is associated with high rail use, or vice versa.

Scottish Transport Statistics data suggests that in Scotland buses accounted for 8.3% of inland passenger/km in 2015, somewhat higher than the UK average of 5.4. This would move Scotland only two places higher in the table above. 8% of all transport trips are on buses (2016 SHS) NB this is different from passenger/km.<sup>4</sup>

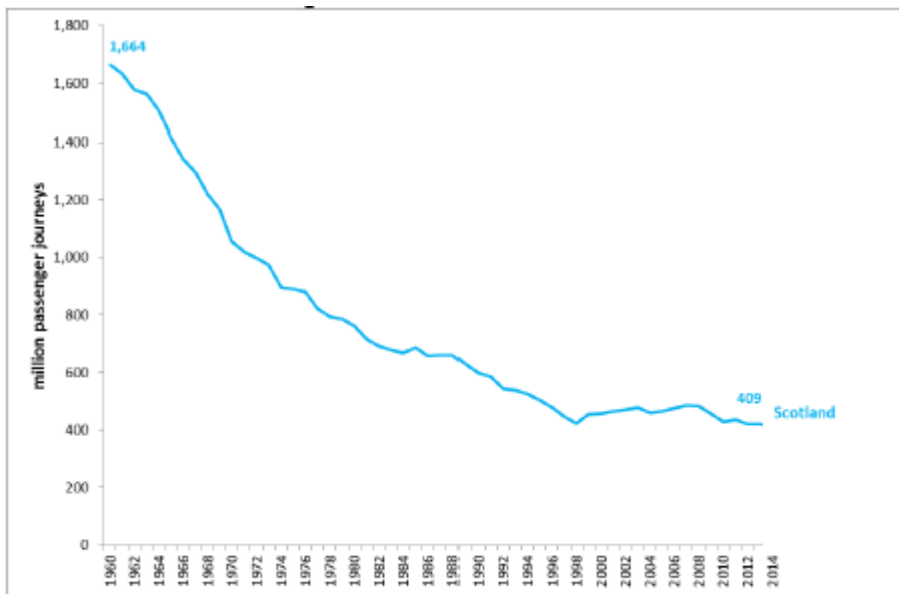
Rail pass/km (est)	Car pass/km (est)	Bus local trips (est)	Bus passenger km (est, 10km/trip)
3,000m	44,200m	425m	4,250m

Public transport mode shares vary even between countries which might appear similar, such as Norway and Sweden, Scotland and Ireland, or ex-East European bloc. Evidently, attempting to compare bus use in the UK with other European countries is not robust benchmarking. It is more useful to compare Scotland with the rest of the UK, and different parts of Scotland with each other (Highlands, Islands and Shetland, the South East, the South West/Strathclyde, the North East, Tayside and Central).

<sup>3</sup> [http://ec.europa.eu/eurostat/statistics-explained/index.php/Passenger\\_transport\\_statistics](http://ec.europa.eu/eurostat/statistics-explained/index.php/Passenger_transport_statistics)

<sup>4</sup> Scottish Transport Statistics 2015

Scottish bus use has declined since at least 1960 (as throughout the UK). Deregulation (1985-86) did not affect this long-term trend. Although the rate of decline slowed at the turn of the century, this data indicates that regulation/deregulation had little or no impact on bus patronage. Therefore, the focus of action to increase ridership should be elsewhere.



Source: Scottish Transport Statistics 2016

Scottish Household Survey data (2015) quantitatively identifies reasons why buses are not used. The reasons quoted require careful interpretation, as they are apparently designed to encourage respondent-generated rather than strictly comparable definitions.

**Reasons for public transport use/non-use for travel to work, 2009-2014**

If they could use public transport, reasons for not using it

Takes too long	48
No direct route	30
Prefer car	15
Need car for work	13
Work unusual hours	8
Cost	9
Lack of service	7
Nothing, unreliable, infrequent, equipment etc, bus stop distance, waiting, comfort, health, prefer walking; all 5% or less	

Sample size 5,200

If they could not use public transport, reasons why not

No direct route	42
Lack of service	25
Takes too long	21
Inconvenient	18
Need car for work	17
Work unusual hours	15
Prefer car	8
Too much to carry	7
Infrequent, unreliable, nothing, bus stop distance, cost, walk instead; all 5% or less	

Sample size 3,620

**In general, what discourages you from using buses more often?**

	2012	2013	2014
Nothing	14.4	14.2	16.3
Takes too long	16.5	13.2	15.6
Inconvenient	10.8	9.1	7.5
No direct route	12.4	10.6	10.1

Use own car	23.8	20.6	18.9
Need a car for,at work	6.2	6.7	4.6
Cost	9.4	9.2	8.2
Public transport unreliable	2.9	3.6	2.6
Lack of service	11.3	11.6	10.1
Too infrequent	5.2	4.4	4.5
Health reasons	9.4	8.7	8.1
Too much to carry	3.2	2.8	2.1
No need	16.0	19.0	20.2
Prefer to walk/cycle	4.1	5.0	3.9
Distance to bus stop	3.3	2.7	2.3
Work unusual hours, accessibility, uncomfortable, waiting, live centrally, walking distance, alternatives (trains, taxi etc.), dirty, get lifts, crowded, unsafe, laziness, no suitable service, other passengers, don't know time/route/fare, rude/unhelpful/poor drivers, difficult with children etc; all under 3%			
Sample size	7,900	7,700	7,759

The SHS examined reasons for modal choice for travel to school. This is a useful perspective, although perhaps of limited use for drawing general conclusions regarding bus travel.

#### Reasons for transport choice to children's full time education 2004-2015

Usual method	School bus	Service bus
Nearby/Not far away	5%	11%
Most convenient	40%	40%
Travel with friends	6%	4%
Safest method	22%	2%
Quickest	10%	7%
Only option	18%	23%
Too far to walk	21%	24%
It is free	14%	0%
No service, unsuitable (eg infreq.), exercise, no car etc, cheapest, on way to work, child's age, relative meets child; all 4% or less		
Sample size	930	470

Qualitative Scottish Government research<sup>5</sup> with 12 focus groups and 12 in-depth interviews highlighted different issues. The researchers categorised three attitudinal types: 'Bus refusers', strongly attached to their cars, did not wish to use buses more under any circumstances; 'Bus pessimists' would like to use the bus more but don't consider it attractive; and 'Willing to be convinced'. The research indicated a lack of knowledge and/or negative perceptions of buses underlying disincentives to using buses. Specific components included:

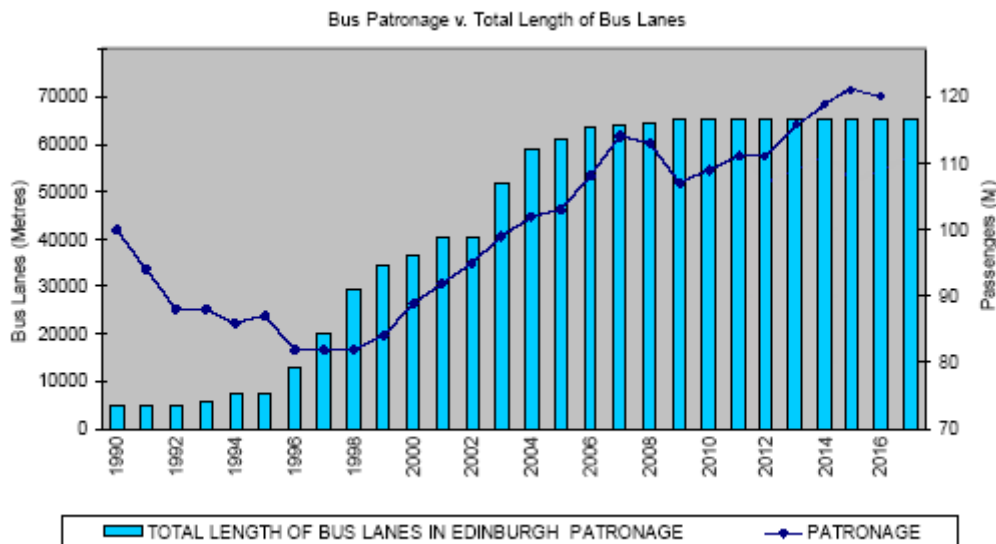
- Bad bus driving behavior, driver attitude
- Other passengers' behaviour
- Condition of buses (unsafe, unreliable, inaccessible, cleanliness, comfort)
- Information provision
- Length of bus journeys and timetables not meeting passenger needs
- Unreliability
- Lack of direct/appropriate routes

<sup>5</sup> Understanding why some people do not use buses; 2010, Scottish Centre for Social Research



- High fares/exact change
- 'Convenience' and 'reliability' of cars: quicker, more direct, multi-stage/multiple journeys, carrying equipment etc, control over journeys and 'travel environment', perceived cost.

The graph below shows how the extension of bus lanes in Edinburgh from 1996 correlated with growing bus patronage. The decline in 2008-9 coincided with increased journey times during tram construction works. From 2010 patronage growth gradually returned, but overall growth has been lower than when bus lanes expanded, and has recently stalled.



Source: original City of Edinburgh Council, updated by Transform Scotland

With a view to the future, the degree of 'churn' in travel behavior should be noted. For present purposes, we note that the main reasons for changing modes were overwhelmingly changing job (35.3% in 2013-15) and moving home (22.8%)<sup>6</sup>.



## Scotland's alliance for sustainable transport

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