

*Please reply to:*  
Wayside Farm  
Etchilhampton  
Devizes  
Wiltshire SN10 3JT

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2 Great Western Close  
Devizes  
Wiltshire SN10 1AQ

## **Wiltshire Council Review of Passenger Transport: Joint response to public consultation 2016**

### **Context and process**

1. The Public Transport survey is a very welcome public opportunity to engage with bus services. The number of respondents, in excess of 10,000 reported to date, is testimony to the value placed on our bus network by everyone: users and non users alike. Wiltshire Council's survey has raised awareness of the bus network's value socially, environmentally and economically. For that reason alone, this is a highly valuable exercise for which we congratulate the Council.
2. The financial constraints and forecasts projected by Wiltshire Council are well understood. Less clear to us is whether objections have been made by Wiltshire Council to Central Government on behalf of its electorate about the impact that these strictures are about to cause.
3. We have objected to Government about the lack of support for buses and suggested ways forward. Likewise we would like to see Wiltshire Council publicly campaign for central government support to develop our bus network instead of seeing it diminished.
4. The current consultation largely relies on a widely distributed paper and online survey with six options asking people how they would be affected by cuts to services at different times of the day or week. But it does not ask which particular services the respondent is thinking about. It will not be valid to compare the numbers supporting the different options if there is no information about the routes they are referring to. The survey focuses purely on the negative option of cuts (incidentally creating scaremongering rumours about massive reductions), and makes no attempt to look systematically at ways of making services more attractive and less wasteful of subsidy (see sections 19 – 33 below). We would have welcomed an opportunity for the community to respond to area wide proposals for improvements. In its stead, Bus Users UK has given people a modest say through several drop in events across Wiltshire attended by a number of your members, staff and operators, but these have generated only anecdotal evidence.
5. By contrast, the bus review being carried out in our twin town of Mayenne in France has appointed a student preparing for his master's degree in public transport planning to consult different sectors about their needs, supported by on bus surveys conducted by students in exchange for pocket money. This will lead to a revised timetable in September 2017. Perhaps Wiltshire Council has this sort of activity in mind in due course.
6. The current 2.5 million annual passenger journeys by bus in Wiltshire represent an average of 5 annual journeys per resident. The size of response to this consultation indicates that there is scope for a dramatic increase in level of usage of subsidised buses if awareness can be raised.

7. Because of inadequacies in the bus network we are also aware that
  - a. any cuts are likely to fall disproportionately on areas such as Devizes where 90% of the bus network relies on a subsidy;
  - b. those least able to afford taxis have to use this most expensive form of transport;
  - c. generous offers of lifts to those without cars undermine people's sense of independence;
  - d. many journeys are made by car instead of by bus from village or suburbs to the town centre, aggravating congestion and raising further the already illegal levels of air pollution;
  - e. many journeys are simply not made, to the disadvantage of businesses and individuals.

**8. We therefore wish to see a bus network that leads to better use of public transport investment and makes it easier for people to travel without a car.**

**Bus Survey**

9. The objective for this survey is to save money. However the calculations are difficult to believe without more information. In Option 4, for instance, it is claimed that £1.19 million a year will be saved by reducing rural bus services to 2 – 3 a day with some exceptions. These services are currently serving 960,000 passenger journeys. If they were all cut then £1.24 per passenger would be saved. On that basis it could be suggested that if fares were increased by £1.24 those services could be salvaged. However we do not know how much ridership will be lost by making the service less convenient. The Trans Wilts rail service project has demonstrated this effect in reverse: when there were only a few trains a day, they were hardly used; now there is a regular, more frequent and well publicised service and the trains are overcrowded. So these calculations are probably not valid.
10. For Option 6, the 'nuclear option' i.e. to remove all subsidised services, the per passenger saving would be £2.04. The questions to help us make sense of the calculations are:
  - a. What would be a viable level of fare increases for the reduced services in Options 1 - 5?
  - b. Would the addition of £2.04 to all fares save our bus services from Option 6? If not why not?
  - c. To what extent would passengers and local councils be prepared to make up the financial shortfall rather than lose their services? Has this been market tested?
  - d. Are there other options worth pursuing or testing?

**Our objections to bus cuts**

11. There are two main reasons why we wish to object to all six options proposed in the Bus Survey:
  - First on the grounds that sustainable transport policies are subsumed by affordability;
  - Second, these proposals for salami slicing reduced services lead to a spiral of decline and represent poor value for money.
12. Other options should be tested first and, if subsequently rejected, robust justifications given.

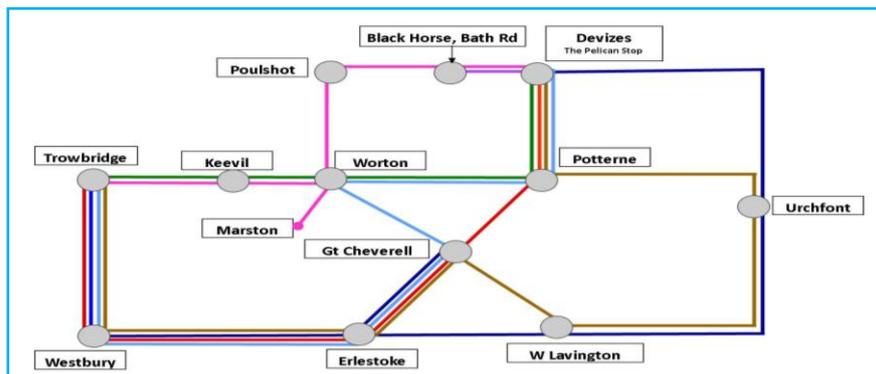
***Land Use and Transport Policy objections***

13. We not long ago participated in a thorough Transport Study by Mott MacDonald leading to a Devizes Transport Strategy adopted by Wiltshire Council in 2012 as part of the county's Core Strategy. We gained useful insights into the causes of traffic and transport problems and created a framework for future decisions about transport affecting Devizes.
14. The Bus Review survey does not fit with Core Strategy objectives finally adopted in 2015 after years of forensic work and consultations. This is a legally binding land use planning document that informs all planning applications to 2026. These objectives and policies have taken considerable collective effort by officers, other professionals and the public who participated in good faith.
15. The Devizes Community Area Plan (2012) produced by DCAP (a local, independent and non-political body) identified some of the main transport issues as a "need to implement travel plans at major employment sites" and "the need to improve local bus services and provide additional bus information".
16. The overarching principle of the Devizes Transport Strategy is to "provide for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport," [2.3.1] further translated as  
*Strategic Objective 1: Delivering a thriving economy;*  
*Strategic Objective 2: Addressing climate change;*  
*Strategic Objective 3: Providing everyone with access to a decent, affordable home;*  
*Strategic Objective 4: Helping to build resilient communities;*  
*Strategic Objective 5: Protecting and enhancing the natural, historic and built environment; and*  
*Strategic Objective 6: Ensuring that adequate infrastructure is in place to support our communities.*
17. In line with the above objectives housing in Devizes has been granted permission on the basis that sustainable transport measures will be taken to mitigate traffic impacts.
18. We would therefore like to know:
  - a. **In what way cutting bus services meets the policy objectives for promoting sustainable transport, reducing carbon emissions, contributing to economic growth and equality of opportunity?**
  - b. **If services were provided because they were deemed socially necessary what is the social justification for removing them now?**
  - c. **How can development proceed if a bus service that existed at the time of permission being granted is reduced or withdrawn?**

### ***Spiral of decline objection***

19. This objection could also be called 'death by a thousand cuts'. We find that proposals for wholesale cuts at certain times of the day or days of the week, or 50%, 75% or 100% reductions, is a crude approach that cannot replace sound research and development such as the work undertaken by Devizes Passengers for the review of the Devizes Town Bus, which found that evening services would meet a significant unmet demand.

20. Without a deeper understanding of performance, how can financial outcomes be forecast? In some cases it might be that a day time service could be removed without affecting the performance of the whole service. On the other hand, increasing the service in the evening might increase the viability of the whole service during the day. For others, removal of a Sunday service forces people to use their car for their outward journey, particularly if they are linking to longer distance rail travel, and so not use the bus on their return journey. In other words, this approach of wholesale cutting across the network leads to a spiral of decline.
21. Efficiency of outcome needs to be the key driver for route design. Whilst some villages are lucky enough to be on a direct bus route, serving them usually compromises interurban bus services. Some of the most chaotic routes serving Devizes area are those to the South West (i.e. routes 77, 85 and 87). They follow different routes according to the time of day and are run by a cohort of different operators (see illustration below) making them impossible to market sensibly.



KEY: The colour of the lines in the route diagram above matches the times listed below.

TIME	No.	ROUTE	OPERATOR
0727	87	Devizes—Urchfont—West Lavington—Erlestoke—Westbury—Trowbridge	Faresaver
0740	77	Devizes—Potterne—Worton—Keevil—Trowbridge	Faresaver
0848	87	Devizes—Potterne—Urchfont—West Lavington—Great Cheverell—Erlestoke—Westbury—Trowbridge	Faresaver
0945	77	Devizes—Potterne—Worton—Keevil—Trowbridge	Frome Minibus
1050	85	Devizes—Black Horse (returns from Mayenne Place)	Libra
1120	85	Devizes—Poulshot—Worton—Marston—Keevil—Trowbridge	Libra
11.23	87	Devizes—Potterne—Great Cheverell—Erlestoke—Westbury—Trowbridge	Faresaver
1320	85	Devizes—Poulshot—Worton—Marston—Keevil—Trowbridge	Libra
1325	87	Devizes—Potterne—Great Cheverell—Erlestoke—Westbury—Trowbridge	Faresaver
1520	87	Devizes—Potterne—Worton—Great Cheverell—Erlestoke—Westbury—Trowbridge	Faresaver
1650	77	Devizes—Potterne—Worton—Keevil—Trowbridge	Libra
1745	87	Devizes—Potterne—Worton—Great Cheverell—Erlestoke—Westbury—Trowbridge	Frome Minibus

22. Since Trowbridge/Devizes is well served by service 49, the purpose of this service should be for
- villages east and south east of Trowbridge,
  - villages west and south west of Devizes, and
  - linking Devizes to Westbury Station.

23. Despite unfavourable financial prospects, Wiltshire Council has taken up the rural challenge to develop and support a pilot for better integration of rail and primary route bus services for the villages in the Pewsey Vale. In partnership with Pewsey and Devizes Community Areas, the Connect2Wiltshire (C2W) Pewsey Vale routes were redesigned and piloted to test the viability of quasi fixed routes. This approach was developed to avoid unnecessary empty mileage between Devizes and Pewsey, and the timetable includes rail connections.
24. This has so far received a favourable response from users, and has the potential to develop further with a local call centre, more reliable buses, and better marketing.
25. This pilot is a valuable model that could be deployed where there are similar settlement patterns or intermittent suburban demand, including the Devizes Town Bus, where a review in 2012 paid for by Wiltshire Council and with a major voluntary input from DCAP and Devizes Passengers, was shelved when Bodmans/Hatts/Wiltshire Buses went into liquidation and the service was taken over by Stagecoach.
26. However, to mature, the C2W pilot needs longer than the 12 months granted for monitoring and review. The cheaper call centre, or texting method have not yet been trialled.

### **Marketing and the Bus Bill**

27. The table below compares the proportion of subsidised mileage in Wiltshire with those elsewhere in the more sparsely populated south west counties:

Somerset	23%
Dorset	24%
Cornwall	26%
Gloucestershire	30%
Devon	31%
Wiltshire	44%

*Source: TravelWatch South West*

28. The lower subsidised mileage might be due to reduced access by bus compared to Wiltshire. However, that there is more commercial bus activity in all five South West counties might not be a coincidence but an indication that the approach to network planning is more market led than historically has been the case in Wiltshire, which has a higher level of bus subsidy.
29. We have identified routes in the Devizes area that could be considered wasted effort and others where there are glaring gaps. In the former are traditional market day bus links from Bradford on Avon and Warminster to Devizes, and the anachronistic route 85 journey along the Bath Road, out to the Black Horse and back from Mayenne Place, which almost coincides with runs on routes 49 and X72. Tourist links from Devizes to Stonehenge and Marlborough (via Silbury and West Kennet Long Barrow) fit with the latter group.
30. While the Swindon to Devizes bus 49 via Avebury is simple, direct and famously attractive, it is extraordinary that tourists are expected to travel the 15 miles from Devizes to Stonehenge via a roundabout route to Salisbury, then change at Salisbury station to come back to Stonehenge on the Tour Bus, totalling 35 miles each way. The return journey by bus would take 4 hours and 29 minutes compared to 55 minutes return by car!

31. The Stonehenge/Devizes bus link is an ideal candidate
  - a. for a quasi commercial partnership in years 1 and 2;
  - b. for replacing the Salisbury village links with a quasi fixed route;
  - c. for tourist packages covering bus fares and admission to Stonehenge, Wiltshire Museum in Devizes, and the museums and manor house at Avebury.
  
32. It has been argued by Wiltshire Council that bus revenue from passenger growth is insufficient to achieve the desired level of savings. We argue that growing the market has a double financial benefit:
  - a. more efficient/cheaper routes to maintain, and
  - b. increased revenue whilst delivering on its core commitments.
  
33. The Bus Bill that is currently going through parliament is granting new powers to local authorities, which is likely to include bus registration, strategies with teeth for bus network planning, minimum standards and multi operator ticketing.
  
34. By combining these new powers (that come into force in 2018) with better marketing and modern bus stop information Wiltshire could look forward to a bus renaissance.
  
35. The choice has been starkly put by a transport professional: *Cutting services is contributing to the downward spiral in bus usage, forcing bus users to stop exercising their choice to travel by bus and creating a climate of failure, reinforcing a negative perception of users.*

## Conclusions

36. The key objective of Wiltshire's bus network should be to lead to better use of public transport investment that makes it easier for people to travel without a car.
  
37. Wiltshire Council needs to target the non-bus user population that is prepared to travel by bus (this is generally considered to be around 20%).
  
38. We therefore believe the aim of the next stage of the review should be to
  - a. plan a network for bus growth for each Community Area and:
    - (i) grow the market by simplifying routes, and ensure there is a budget for marketing;
    - (ii) improve links to rail heads;
    - (iii) encourage people to have an evening out without the car;
    - (iv) ensure that people who do not have easy access to a car still have their transport needs met;
    - (v) support and embrace the policies in the Core Strategy and Devizes Transport Strategy, and
  - b. reduce subsidies on the basis of improved performance and negotiate hard with operators using the new powers afforded by the Bus Bill.
  
39. It is unacceptable to lead policy makers into believing that they are doing something good when they are not. Instead the approach of policies 'if affordable' is leading to a culture of decline.