

The Cambridgeshire and Peterborough Combined Authority Bus Strategy Consultation - a response from the Cambridge and South Cambridgeshire Green Party

Overarching points

The Cambridge & South Cambridge Green Party (CSCGP) welcomes the opportunity to respond to this important Bus Strategy published by the Cambridgeshire & Peterborough Combined Authority (CPCA).

- **Relationship with other plans and strategies**

We understand this consultation to relate solely to the Bus Strategy, which is a set of overarching principles that would be used to plan and deliver improved bus services across the region. It is stated in the document that details of delivery and funding are in the Bus Service Improvement Plan (BSIP), which was prepared earlier, in 2021¹. It is not entirely clear to us how these two documents will relate to each other in practice (since usually the details of a plan would flow from the overarching strategy, not the other way around). We would suggest that in future iterations of this plan, the strategy and the operational details be presented and considered together.

This strategy should include a report on performance to date against the goals set out in the BSIP, as well as, critically, **setting out how progress will be monitored and reported going forward**.

The other key document in play is the Greater Cambridge Partnership's proposal for a Sustainable Travel Zone (STZ). This is acknowledged at several points at the document but again it is far from clear how the two things fit together. To what extent does delivery of the Bus Strategy depend upon the outcome of the STZ proposals? Are the Combined Authority and Greater Cambridge Partnership working to the same set of aims and objectives? Does one answer to the other or are they working independently in parallel? The STZ consultation had extremely high public engagement and is proving highly controversial, with the lack of detail about bus improvements contained in the plan one of the key criticisms. Most residents will not understand why they are now being asked their views on an apparently entirely separate consultation about bus provision.

- **Vision and aims**

The vision and aims expressed are laudable and invite support. Few would argue with the proposal to aim for a bus service that is "convenient, attractive and easy to use, part of a fully integrated and planned transport system, reliable, value for money and representing a total

¹ <https://cambridgeshirepeterborough-ca.gov.uk/wp-content/uploads/documents/transport/buses/Bus-Reform-Mayoral-Task-Force/CPCA-BSIP-Final-291021.pdf>

transformation of bus travel". They are however generally high level and vague – the devil will be in the detail of how they are delivered.

CSCGP views the need for an improved regional bus service delivering equitable and fair benefits to all as a **social justice** priority. The bus service offered should ensure that everyone can use the buses even in the most remote areas as well as in the high-use urban centres. We would add that the staff delivering the service need to be supported on secure contracts from employers who value their welfare. As well as being socially just, this should improve staff recruitment and retention – currently a significant issue causing a drop in reliability on many bus routes. Such staff are also more likely to provide the attractive easy-to-use service that is desired.

An improved bus service is also clearly an **environmental** priority. The regional climate targets proposed by the independent commission, with doubling of bus passenger numbers and a 15% reduction in car mileage by 2030, must be achieved as a minimum. We are concerned to note that the strategy documents contain mixed references to 2030 or 2050 targets, low emission or zero emission vehicles. We would only support strong environmental and climate targets, zero emission across the fleet (as stated in BSIP) and a deadline of 2030 not 2050. Optimising bus journey efficiency, and hence reducing emissions, through the use of dedicated priority measures such as bus gates / modal filters are initiatives that we strongly support.

- **Operational model**

Vital for the delivery of this strategy will be the operational model chosen. We support the intention to explore franchising as the preferred model and would welcome a detailed plan. We emphasise that, whatever model is adopted, it is important that the time required to put it in place does not delay significantly the implementation of the bus strategy. Given that this regional bus service will have to be integrated with the GCP Connecting Cambridge initiative both need to proceed together. The GCP timeline starts from 2023, and any major delays in the regional bus strategy would therefore make it very difficult to deliver the integration required.

We believe that successful delivery will require under all circumstances:

- i) A version of franchising or a 'strong' partnership approach
- ii) road space reallocation

- **Integration with other forms of transport**

This bus strategy does not state clearly how the service would be integrated with other forms of public transport in the region. More details on bus rail link-ups, on how any planned rail expansion might be incorporated into the network, would be helpful. The strategy is predicated on the bus as the only backbone to the public transport network. Have other forms of public transport such as very light rail (VLR) have been considered at any point?

- **The needs of users with disabilities.**

We call for specific text to be added in the vision and aims relating to the needs of disabled passengers and how these will be met.

Responses to survey questions

We support many of the responses proposed by the Cambridge Sustainable Travel Alliance, and have added comments from our own review of the consultation documents. Where relevant, we include notes relating to the more detailed BSIP document.

We also include appendices will cover more detail on the Franchising model, the alternatives, and some comparative information from Oxfordshire and from the Netherlands.

Section 3: Bus Strategy Vision

Response: We **agree** with this vision.

Notes:

We note that the BSIP has a subtly different approach:

Bus Strategy: "The vision is for a comprehensive network of bus services across Cambridgeshire and Peterborough that people find convenient, easy to use, reliable and good value for money, that is inclusive and offers a viable alternative to the car."

Bus Service Improvement Plan: "Everyone should have the opportunity to travel; their chances in life should not be constrained by the lack of travel facilities open to them"

We question why these two documents have different Visions given that they are supposed to be elements of the same plan. We tend to prefer the BSIP version as its overall intention is directed at how transport can affect people's lives rather than the provision of an effective transport system.

We suggest the target of doubling bus passengers by 2030 based on 2019/20 levels is unambitious, given the impacts of the pandemic and service cuts on the baseline year. We note that targets require a reduction in car miles of 15% by that date and wonder whether a doubling of passenger numbers is sufficient to support this (the 15% target is itself unambitious, compared to for example 25% in Oxfordshire (see Appendix).

The aspiration of "Buses are part of a fully integrated and planned transport system" should explicitly mention cycling and walking including safe routes to bus stops and secure, accessible cycle parking, mobility vehicles, and other electric vehicles such as scooters.

Section 4: Bus Strategy Aims

Response: we **agree** with the aims.

Notes:

While we support the aims as set out, we strongly criticise the absence of explicit targets against which progress can be evaluated. We note that the BSIP document does contain

quantified targets for the objectives of reliability, journey time, passenger growth and passenger satisfaction. We suggest that these targets should form part of the Bus Strategy, or the links between the two documents made much clearer.

Convenient:

1. Page 12 of the strategy document refers to a table about frequency which is not present in the document. Without this inclusion we cannot express support for any frequency. 'Frequent' will inevitably mean different things on different services.
2. There needs to be a rationale for 'range of tickets'. Having a 'range' should not be prioritised over simple ticketing that can be easily understood by all users.
3. There must be a clear definition of 'evening'. It is essential that buses are available for hospitality and shift workers. Service hours must be specifically stated.
4. Rural routes should meet or exceed the aspirations of the Campaign to Protect Rural England's 'Every village, every hour' campaign. 'On demand' services can contribute to this target.
5. There should be a 'no stranded passengers' aim including avoiding overlong journeys owing to delays and missed connections.
6. The strategy states that "all areas are well served by bus". Once again, this is a vague aim that is open to interpretation. A clear definition of "well served" must be provided.

Attractive:

The aims the Combined Authority has stated here are by and large sensible. We believe the core elements for an attractive bus service are:

1. Reliable, times and places
2. Staff are customer focussed
3. Buses are of a good and comfortable standard
4. little crowding, i.e. expansion and contraction of capacity by demand

Traffic congestion (as well as being one of the problems which improved bus services will help solve) is a key challenge to delivering reliable and frequent bus services. The strategy states that "wherever possible, measures will be put in place to prioritise road space for buses, or provide new dedicated infrastructure for buses to use, so they can travel unhindered and quickly, ensuring punctual services that people can rely on." CSCGP urges that bus prioritisation should be in line with the 'hierarchy of road users' – a concept that places those road users most at risk in the event of a collision at the top of the hierarchy. Bus priority must not be at the expense of active travel. The Greater Cambridge Partnership is pushing forward a number of new busways as part of its transport strategy. New busways are expensive, highly environmentally destructive (in terms of use of raw materials such as concrete, and also land take) and we believe should only be preferred where they provide clear advantages over modifying the existing road network. We do not believe this to be the case for the Cambridge busways (see for example the alternative to the Cambourne busway put forward by Smarter Cambridge Transport²).

² <https://www.smartertransport.uk/cambourne-to-cambridge/>

Easy:

1. The strategy should view the concept of 'easy' from the perspective of a visitor to Cambridgeshire with no prior experience of our bus service. Would a visitor find it easy to find out how to use our buses, where and when our buses travel, and how ticketing works? The bus service must also be 'easy' for all passengers, including those with disabilities, those travelling with children, etc.
2. The point "Buses run at regular time intervals and with consistent frequencies," is crucial – people must be able to rely on the bus departing and arriving on time (with real time information if things go wrong.)
3. The point "Ability for people to transfer between bus and other travel modes (walk, cycle, e-scooter, car, coach, train)" should elaborate on what the transfer experience should be like. For example - transfer safely, easily and affordably. It should also elaborate on the impact that ticketing systems will have on transfers. There should be shared ticketing so that new tickets are not required when transferring across operators and transport modes.
4. This section should also include the aim of simplicity. Passengers should be certain that they have the best/most suitable ticket and route without the complex comparison of options which is currently required.

We would add the following specific points:

- There must be safe, speedy and accessible pedestrian movement between bus stops and between buses and other transport modes e.g. trains. All stops should be connected to a footway which is suitable for use by passengers using wheelchairs or other mobility aids.
- All stops should display printed timetable and key fare information and a location-named bus stop flag with the phrase 'Towards [key destination(s)]'.
- Wherever possible a shelter, with seating, lighting, and timetable and real-time bus information should be provided.
- Key edge-of-town and edge-of-village locations should be developed as 'travel hubs' with secure cycle-parking facilities and interchange facilities with demand-responsive transport.
- Reliable bus services that users can trust.

Section 5: Delivering the bus strategy

Response: we **agree** with the principles.

Notes: Again, although positive as far as they go the 4 "main principles" are very vague and have no claim to being comprehensive, or subject to performance evaluation.

Continuous cycle of passenger growth and service improvement

This is intuitively appealing but we would like to see a more evidenced case for why and how it will work in practice.

Will the approach set in the BSIP document, where the share of risk for lower growth rates will be shared between the service provider and the council (thereby providing a measure of security to the new service provision and attendant) still apply?

Mode of provision

This point is very important but seems to be deliberately left vague. The Strategy document indicates that franchising is the Combined Authority's preferred model. The BSIP document mentions a "franchising assessment process" – has this now been completed, and if so, where can the results be viewed? Do the assumptions adopted for the 2021 Outline Business Case Assessment (paragraph 1.19 of the BSIP document) still apply to the current proposals?

We agree that the current 'Enhanced Partnership' approach is not delivering the best service for the region. It is clear that a visible change in how bus services are controlled is necessary to restore public confidence in some of our bus services. We welcome the Combined Authority's intention to explore bus franchising and would like to see a detailed proposal on franchising, including a statement of how control and management will be exercised before any franchising arrangements can be set up. It is critical that improvements to the bus network are not delayed because of the complexities of setting up franchising.

Partnership

We feel that a key theme missing from the strategy is staffing. This strategy must be clear about how bus driver recruitment and retention will be improved. There should be more information about better conditions, pay, career progression and flexible working hours for bus drivers. CSCGP believes that the strategic aims, objectives and aspirations must include putting the wellbeing of the staff running the fleet as a top priority. This means taking care of all those involved: drivers, cleaning staff, maintenance staff and customer service staff. Value these people and the bus system will not only provide a fair and just means of making a living, setting a standard for the private sector, but also massively increases the likelihood of it being an efficient and high quality service satisfying many of the aims and objectives already set out in the strategy. In addition, we feel proper investment in the staff who run the bus system would tackle some of the challenges outlined such as variable standards of service and the wish for a more reliable bus service.

To this end we propose some specific measures:

- **No zero-hours contracts.** Any bid for the franchising of this bus service must forbid any zero hours contracts. The government sets out the guidance for zero-hours contract employers³ and it is clear to us from reading this that employees providing a

³ <https://www.gov.uk/government/publications/zero-hours-contracts-guidance-for-employers/zero-hours-contracts-guidance-for-employers>

bus service should not come under this type of contract. We feel operations of a bus should not be run like a temporary employment agency which results in job insecurity, lack of sick pay and pension for the individual and high staff turnover, less reliability, consistency, less investment in organisational values for the organisation, and predominantly for the customer of the service, in this case: the passengers using the bus. It is unjust that a profitable company such as Stagecoach (£17.6 million for 2022) sidesteps its duty to provide a stable and secure living for those running its fleet in favour of money-saving quick fixes. This is the UK's biggest bus operator who employ 23,000 people in England, Scotland and Wales and have been running buses since 1980⁴. Therefore, we request that any franchising bidding process must set out the types of contracts offered: permanent ones that include sick benefits and a pension plan. We would like to see additional detail on how secure employment can be provided on the proposed 'on demand' bus services.

- **Living Wage.** The real Living Wage should be paid to those working to deliver this valuable public service, and this must be a condition of a franchising contract. The real Living Wage is currently £10.90 an hour compared to the government's 'national living wage' which is £9.50. The latter is not calculated according to what employees and their families need to live, rather it is based on a target to reach 66% of median earnings by 2024⁵.

Integration

We agree with the principles set out here but greater detail is needed. . More details on bus rail link-ups, on how any planned rail expansion might be incorporated into the network, would be helpful. Also whether other forms of public transport such as very light rail (VLR) have been considered for any part of the network, following the encouraging examples of cities such as Coventry⁶.

Section 6: Strategies

Answer: clearly these strategies are interdependent and all are needed to deliver the aims of the strategy, but in this context we would rank them as follows:

1. Getting to places quickly and on time
2. Value for money and simple ticketing
3. Bus services for rural areas
4. Bus services people want to get on
5. Information and getting the message out
6. Integrated coherent network
7. Delighting customers.

⁴ <https://www.stagecoachgroup.com/who-we-are.aspx>

⁵ <https://www.livingwage.org.uk>

⁶ <https://www.coventry.gov.uk/verylightrail>

Notes:

- Bus information (fares, timetables, places served and stop locations) is currently very poor. 'Information and getting the message out' will be a quick, easy and cheap improvement.
- People unable to drive, or otherwise without a car, in rural areas, are cut off from employment, educational, cultural and social opportunities.
- There is currently a confusing range of tickets, mainly valid only on one operator's services, whilst queries to the driver about 'best value' delay boarding and lengthen journey times. They also discourage bus travel.
- Major operators' maps don't show other operators' services. There should be clear journey planning information with multi-operator ticketing and recognised interchange points.
- Getting to places quickly and on time seems dependent upon the points above.
- 'Bus services that people want to get on' are dependent upon the factors above, i.e. it is a meaningless in and of itself
- 'Delighting customers' is an outcome if all the strategies above are effective. There is an unanswered question as to who is 'delighted' – not all passengers have the same requirements or expectations. It would be informative to explore whether there are real world examples of 'delightful buses' already in existence.

Conclusion

The Cambridge and South Cambridgeshire Green Party have some summarising comments to make on this consultation by the Cambridge and Peterborough Combined Authority. Firstly, its relationship to the recent highly politically-engaging and controversial Greater Cambridge Partnership's Making Connections Consultation needs to be stated as the lack of clarity about why there are two separate consultations on buses running closely together is disorientating.

Further, the CSCGP feel this strategy is a starting point but there needs to be much more shape and structure given to it to make it a proper checking point for future use. The CSCGP hold that it needs to be much more prescriptive and ambitious in terms of social justice and environmental goals, particularly concerning the overarching goal of carbon neutral – is it 2030 or 2050? It is stressed that a goal of 2050 is simply too late for the planet.

Implementation of franchising also needs to be tackled promptly and vigorously as this could take an excessive amount of time when there is a great amount of urgency to provide sustainable transport in our region. Social justice must be at the forefront of a franchising bid taking care of the livelihoods of those who run the bus service and also providing fairly for those who are expected to use the bus service, particularly the needs of disabled passengers.

Appendices

A detailed breakdown of implementation of a bus franchise

*How will bus franchises be implemented?*⁷

When a MCA (or other authority which has been afforded the applicable powers) wishes to implement a franchising scheme, it must complete a detailed assessment and submit this to the DfT for approval. This is a detailed process and includes similar elements to the test described above. Below are all of the elements to this second assessment:

Developing a compelling case for change – the authority should:

1. describe their overall aims and how bus services play into these
2. provide current and predicted information about performance of local services
3. explain why the geography of the area is appropriate for a franchise model; and
4. detail what issues passengers are currently facing.
5. Setting objectives – the authority needs to set clear objectives for its proposed bus franchise which are "specific, measurable, achievable, realistic and time-bound."^[2] There should also be specific objectives relating to the affordability of the scheme and how it represents value for money
6. Options generation and refinement – the authority should engage with bus operators in the area to explore whether a franchise agreement is really the best solution, or if there is a realistic proposition to implement other ideas instead (such as partnerships with current operators or a new ticketing method)
7. Detailed assessment of options – all shortlisted options should then be assessed based on the following criteria:
8. strategic case (how will each option achieve policy objectives?)
9. economic case (what value for money will each option provide?)
10. financial case (how much will each option cost to create and maintain?)
11. commercial case (how will each option be procured and contracted?); and
12. management case (how will each option be delivered and managed?).
13. Auditor's assurance report – once the business case has been compiled, an independent auditor with professional accountancy qualifications must be hired to form an independent opinion that the information gathered by the authority meets the required standard for review by the DfT
14. Consultation – finally, the authority must consult more widely on its proposals to ensure that local passengers, businesses and transport providers are able to comment on each of the options available.

Only when all of the above steps have been successfully completed can the authority submit its case to the DfT for a bus franchise to be implemented in their area. The DfT will then have the final say in deciding if a region is to be allowed to (1) exercise the powers under the Act and (2) implement a bus franchise system.

⁷ Taken from <https://www.lexology.com/library/detail.aspx?g=7d45c03a-95e3-46fc-b323-2ddb7f24efa2>, David Newcastle and Richard Collins

Alternatives to bus franchises

The process of creating a business case to propose a new bus franchise in any given area is one that would take a significant amount of time and money for an authority to invest in. Despite this, there have been recent examples of major UK cities making public steps towards the franchising model.

One of the most prominent has been Manchester, where former Chancellor and current Mayor Andy Burnham is a vocal supporter of change to the current local bus network which he describes as "confusing [and] overpriced." The city will be holding a public consultation on the issue later in 2018, and other areas such as Leeds and Middlesbrough appear to be following suit. Leaders in these areas are pushing for an updated system which allows for a more consistent bus service offering in their area, and franchising would be one way in which they can achieve this.

A suggested alternative is a "partnership approach" – something which the Act provides further guidance on. In short, there are now two different forms of partnership that can be created between a local authority and a bus service operator:

1. an Advanced Quality Partnership Scheme - an attempt to upgrade the provisions of the Transport Act 2000 which introduced the Quality Partnership Scheme (the model which many UK bus services currently follow); and
2. an Enhanced Partnership - a more formalised agreement between a local authority and local bus operators which allows the local authority to dictate terms to some degree. However, on key points, these terms must be agreed with the authority by a majority of bus operators who are active in their catchment area.

It is expected that many current Quality Partnership Schemes will transition to an Advanced Quality Partnership Scheme in the future, with the Enhanced Partnership seen as a form of "halfway house" between the current system and a full franchise model.'

Oxford BSIP⁸

The comparison between the BSIP of that of Oxfordshire and that of Cambridge illustrates quite a different approach

BSIP objective EP approach

Significant and detailed emphasis on the quick and timely deployment of funds already held by the Council for improvement of the bus stop estate

BSIP objective EP approach

1. Keeping buses at the heart of decision-making

- Embed Council commitment and the corporate priority to
- 'invest in public transport to significantly reduce reliance on car journeys'
- Governance of EP via the Enhanced Partnership Board

⁸ <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/OxfordshireEnhancedPlan.pdf>

- informs decision making, e.g. via the County/City Council Joint
- Member Group
- The Local Transport & Connectivity Plan Mode Hierarchy is applied to reflect the priority given to bus and ensure that positive decisions are made to promote and support bus travel and improve integration with other modes

2. Making buses

- faster and more
- reliable
- Achieve a 10% improvement in bus productivity in Oxford city
- Implement bus priority measures at key locations including Oxford city centre
- Improved management of roadworks, including appointment of a bus champion
- Implement signal detection technology improvements

3 Upgrading bus

- infrastructure
- Identification and improvement of the bus stop estate, with defined standards
- Development of the mobility hub concept in rural areas and areas associated with growth
- Improvement to Real Time Information provision

4.Improving the

- image of buses
- Developing a consistent/single brand for the Smartzone area
- services, including livery
- Consideration of measures to assist boarding/alighting on
- certain busy routes
- Roll out of audio-visual systems, Wi-Fi and device charging on
- new vehicles
- Ensuring buses are promoted by the County Council and
- partners through existing and new channels

5.Making buses

- easier to access and understand
- Development of an improved bus network, with greater hours of operation and coverage
- Improvement of cross-boundary bus links
- Modernisation and improvement of multi-operator ticketing systems
- Simplification of bus ticket range, including extension of youth fares
- Behavioural change initiatives with employers
- Enhanced publicity and customer information
- Development of a customer charter

Some targets:

- replacing or removing 1 in 4 current private car trips by 2030;
 - delivery of a zero-carbon transport network by 2040, alongside
- replacement or reduction of 1 in 3 current private car trips; and
 - delivery of a transport network which contributes to a climate positive
- future by 2050.

The above are more ambitious targets than those of Cambridgeshire.

The issues for ranking in consultations are different to those offered for review in Cambridgeshire.

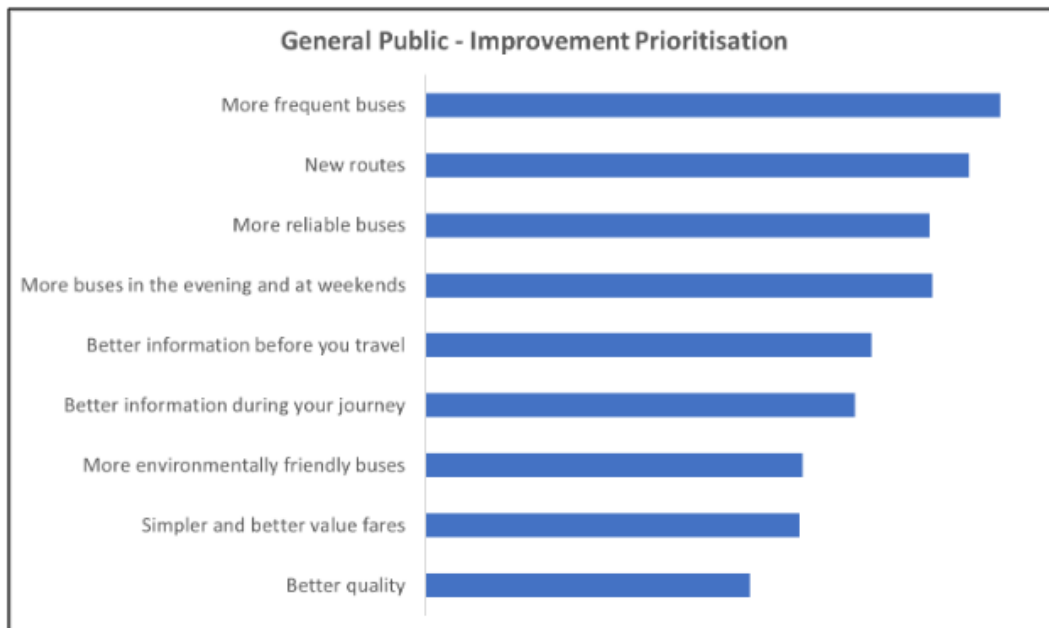


Figure 4 - Preferences of the general public

There is also a specific role for a citizens assembly in contributing to the policy.

A timeline

Table 7 - Impact of Central Oxford measures on buses in Oxford

		Increases bus productivity & use by....		
Measure	Implementation date	Improving bus journey times & reliability	Managing demand for car travel	Generating funding for bus service improvements
Trial traffic filters	December 2023			
Permanent traffic filters (subject to successful trial)	2025			
Zero emission zone	2025			
Workplace parking levy	2025			
A40 bus lane and new Transport Hub	2023			
A44 and Woodstock Road bus lanes	2023 - 2024			
Bus priority at traffic signals	2023 – 2025			
Controlled parking zones	2022 – 2025			
Removal of on-street parking	2022 – 2025			
Improved network co-ordination	2025			

Measures that are to be funded through the Bus Service Improvement Plan and Zero Emission Bus Regional Area (ZEBRA)

Scheme Name	Details	Location	Timescale for delivery
Connecting Oxfordshire and Zero Emission Bus Regional Area (ZEBRA)	<p>Delivery of up to 159 electric buses, as well as ancillary upgrades to depots, for both Stagecoach and Go-Ahead (Oxford Bus Company). These buses would primarily operate within Oxford</p> <p><i>Note: achieving this measure is dependent upon the delivery of works to improve bus journey times by 10% in Oxford SmartZone by Oxfordshire County Council, as outlined in Annex B.</i></p>	<p>Initial consultation identified the potential locations of traffic filters being on Thames Street, Hythe Bridge Street, St Clements, St Cross Road, and Hollow Way. The precise locations of the filters will be determined once the public consultation exercise has been completed.</p>	<p>Vehicle tender award and orders placed: by January 2023</p> <p>Depot works: From 1 April 2023 until 31 August 2023</p> <p>Vehicle delivery: From 31 August 2023 until 29 February 2024</p> <p><i>All timescales are subject to detailed feasibility work and consultation</i></p>

Clear bus replacement targets