

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL

SUBMISSION FROM CITIZENS ADVICE SCOTLAND

Citizens Advice Scotland (CAS), our 60 member Citizen Advice Bureaux (CAB), the Citizen Advice consumer helpline, and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone.

In 2017-18 the Citizens Advice Service network helped over 295,100 clients and dealt with almost 800,000 advice issues for clients living in Scotland. With support from the network clients had financial gains of almost £142.2 million and our self-help website Advice in Scotland received approximately 3.2 million page views..

CAS welcomes the opportunity to respond to this Call for Evidence. A large part of our response is based on our (2018) "Creating Better Journeys"¹ report.

Summary

Low Emission Zones

- Support to access EVs should be aimed at low income households
- Public transport options must be available for a variety of travel needs within LEZs so that those with different travel schedules or access requirements are not forced to use (and pay charges related to) higher emission vehicles.

Bus Services

- Local transport authorities having more options available is positive, given the negative impact cuts and changes to bus routes can have.
- We would like to see the Scottish Government go further in protecting access to and frequency of "lifeline" services, e.g. routes to GPs/Hospital.
- Recognising the importance of meeting local community needs is positive, though rurality and SIMD should be included in considerations.
- It is positive that service standards could include frequency and maximum fares and pricing.
- However, service standards should also look at evening and weekend provision, and address the lack of direct services on some routes.
- CAS is pleased to see more information will be provided to the public, allowing consumers to make informed choices.
- It's important that both bus users and non-users are consulted regularly
- Enabling local transport authorities to work with others is a positive step, although this should include planning authorities.

¹ Citizens Advice Scotland (2018), [Creating Better Journeys](#)

Smart Ticketing

- Pleased to see a multi-journey approach being taken.

Any other views?

- Integration of transport is key.

Part 1 – Low Emission Zones

In order to meet targets for the uptake of electric vehicles (EVs) appropriate support for people to upgrade to electric vehicles will be necessary. We note that this Bill would give Ministers grant-making powers. At present the grants provided by the UK Government to access EVs are not aimed at low income households. CAS would welcome the Scottish Government leading the way by ensuring that any grants are targeted at those on lower incomes to allow them to access the EV market.

Widespread EV uptake will require upgrades to the energy network, the costs of which will be met by all energy bill payers, including those without access to any type of car. At present, 40% of households with an income between £15,001 and £20,000 have no access to a car; and 26% of households with an income between £20,001 and £25,000 have no access to a car. Without targeted support to access the EV market, it is unlikely that consumers on lower incomes will benefit from the changes they have paid for. Many people have limited choice about what time they travel and where they travel to. To prevent LEZs inadvertently penalising those with different travel schedules or accessibility needs, they should be developed in conjunction with public transport providers to ensure that adequate low emission travel modes are available, e.g. buses services at times which allow shift workers to use them.

Part 2 – Bus Services

CAS welcomes that local transport authorities will have more options available to them in terms of the provision of local bus services and meeting the needs of the local community. In response to the CAS survey we heard from consumers that buses could provide a lifeline service and we heard of the negative impact changes or cuts to services can have, on local communities as well as on individuals. The “Creating Better Journeys” report highlighted that there are a number of places people would like to travel to by bus but are unable to, the top three being GP/Hospital, work, and a supermarket. Comments from survey respondents demonstrating the important role which buses play in consumers’ lives and the impact of cuts to local bus services are included in the Appendix.

Allowing local transport authorities more time to consider their options when they are informed that a bus service is being withdrawn by a bus operator is positive. CAS would recommend that when considering the local needs of a community the local transport authority should consider its rurality and where it is located in terms of the SIMD. Within “Creating Better Journeys” we found differences between urban and rural areas. For example, respondents in rural areas were much less likely to be frequent travellers (16%)

than those in all other areas (32%), and were also marginally more likely to encounter difficulties accessing a range of services. Additionally, we analysed responses by the SIMD quintiles and found that respondents from the most deprived quintile were more likely to travel by bus 5 or more times per week (43%) than respondents in the least deprived quintile (23%).

We are pleased to see that local transport authorities will be able to work with others within these new options. The fifth most commented on issue within the free text box in the CAS survey was 'Speed/lack of direct routes'. We hope these proposed measures address this issue. CAS recently held a discussion forum on transport with Citizens Advice Bureaux staff who highlighted the importance of local transport authorities being in regular contact with local planners. CAS would therefore recommend that planning departments are also included in these discussions.

Bus Services Improvement Partnerships (BSIPs)

In relation to BSIPs CAS welcomes that frequency of local services is a requirement that may be included in the service standards. Almost two-thirds of respondents (64%) said that they were dissatisfied with the service frequency of buses. This was the third highest area of dissatisfaction for survey respondents. Additionally, when asked to choose which three aspects of bus services were most important, 72% of respondents chose service frequency as one of the three most important aspects. Many comments were also made in the free text box in relation to service frequency and the lifeline services buses can provide. CAS would be in favour of any steps being taken to improve the frequency of local bus services.

CAS are pleased to see that in forming these partnerships local services will be analysed and views sought from their users. Our findings in "Creating Better Journeys" were that there was regional variation in bus use levels; satisfaction and dissatisfaction with local bus services; and what issues were more important to respondents. Therefore, CAS considers it important that any option being considered takes into account the local needs of the community and the local solutions required.

We also welcome that BSIPs are aimed at improving the quality or effectiveness of local services and hope this will have a positive impact on consumers. CAS notes that when preparing any reports on the effectiveness of partnership schemes the local transport authority would be required to consult those they consider appropriate. We would suggest this should include the local community, taking account of both bus users and non-users. CAS would also recommend the local community being included in consultations by the local transport authority on the initial partnership proposal and any proposed changes to the partnership. A common theme in responses to the CAS survey was the feeling that the consumer was not listened to and/or their comments were not given consideration by bus operators.

We welcome that maximum fares and pricing may be included within BSIP's operational service standards although we do not think this goes far enough. In response to the CAS survey the third most important issue to respondents was value for money, with 39% of

respondents selecting this issue. Public transport can provide a lifeline, particularly for those living in rural communities, so it is vital that fares and pricing on buses do not create a barrier for consumers. Based on the difficulties highlighted below, CAS would like consideration of fares and pricing when considering the types of tickets provided; and potential subsidies for certain groups.

CAS would like to highlight concerns regarding travel to Jobcentres. The CAS “Round the Bend”² report looked at the ability to travel to Jobcentres and found variation in the median cost of a return, the lowest being £3.90 and the highest being £9. This raises two issues. Firstly, the cost to benefit claimants to ensure they are able to attend the Jobcentre, particularly in relation to the proportion of the benefits they receive. Secondly, some clients who visit CAB have been unable to meet the travel costs of Jobcentre appointments and, as a result, have been sanctioned and lost their benefits. Cases illustrating these difficulties can be found in the Appendix.

Local services franchises

CAS is pleased to see that service standards would also be required in local services franchises. We hope that the standards in both BSIP’s and local service franchises ensure more consistency for consumers. As mentioned previously, our survey found some variation across Scotland so we would highlight the importance of seeking the views of the local community when consulting on proposed franchises.

Information relating to services

CAS was pleased to see that more information will be provided to the public, including on timetables and fares. We hope this will allow consumers to make more informed choices and get better value. 9% of respondents to the CAS survey considered ‘information accuracy’ to be of the most importance and it was also commented on within the free text box. We would advocate for this increased information being available both online or offline, as not all consumers have the ability or skills to access information online (as explored in a recent CAS report³).

Part 3- Smart ticketing

CAS welcomes the multi-journey approach being taken in relation to smart ticketing. The importance of smart ticketing being available on multiple modes and operators was highlighted by respondents to the CAS survey. Smart ticketing on multiple modes and operators would help improve the experience of passengers on public transport. Comments supporting this integrated approach are included in the Appendix.

CAS also welcomes that provisions for a ticketing scheme would include providing information about the arrangements to the public and publicising local services, fares and

² Citizens Advice Scotland (2016), [Round the Bend](#). This was a collaborative research project with 16 CAB which covered the experience of 113 local communities in Scotland and gathered research on over 1,200 journeys from 133 home locations to key essential services.

³ Citizens Advice Scotland (2018), [Disconnected: Understanding digital inclusion and improving access](#)

ticketing arrangements. As highlighted previously, this allows the consumer to make an informed choice about their travel.

Any other views: Do you think the Bill as proposed will achieve its aims? Is there anything else that you feel should be included or excluded from the Bill?

1. CAS would recommend that the Scottish Government go further in protecting access to and the frequency of buses to lifeline services, such as to a GP/Hospital. Survey respondents were asked if there was anywhere they would like to travel to by bus but were unable to and 16% of respondents answered GP/Hospital. Unavailable locations by bus were also highlighted by respondents in the free text box. Additionally, a commitment to ensure access to lifeline services could be one area where local transport authorities could utilise the new options available to them.
2. Integration of transport was an issue mentioned frequently in the free text box of our survey. This included comments regarding long journeys on multiple buses and in terms of moving between modes of transport, e.g. trains, ferries. One issue which was raised was being required to wait a long time when changing between either different buses or different modes of transport. Consequently, CAS recommends that steps should be taken to improve the integration of transport, both in relation to Smart Ticketing and through the new options available to local transport authorities.
3. As highlighted earlier, CAS welcomes the presence of service standards for both new options available to local transport authorities. However, a lack of evening/weekend services and a lack of direct buses were key issues highlighted by survey respondents in the free text box. CAS would welcome explicit reference being made to these in the service standards, particularly to ensure that the transport needs of the local community are met.
4. CAS recognises that the duties to consult on new partnerships or local service franchising is a positive step. However, a large number of issues were raised about existing local services in response to our survey. We recognise that some local transport authorities and bus operators are already taking steps to consult with the local community. However, to ensure consistency across Scotland, CAS recommends that a commitment to regularly consult on existing services is also included in the Bill.

Appendix – case studies and comments from survey respondents

On cuts to lifeline services:

“We no longer have a lifeline service to our local village. The first bus leaves the village for the city centre at 9.20 making access to work, college and university impossible for a 9 o'clock start. The latest bus leaves the city at 2.30 making return from work, college, university impossible. This also leaves a limited time span for outpatient appointments at hospital.”

“In April the local bus company withdrew services completely from our village. Local residents, especially those who are elderly, young or less mobile have been struggling to travel in and out of the village since! As a consequence they have a reduced quality of life as they can't get out to visit friends and family, attend medical appointments, go shopping and as there are no weekend services, attend church. Due to the limited services we now have, some people also struggle to reach work on time!

On difficulties in attending Jobcentre appointments due to cost or availability of public transport:

A client in the Borders spends 10% of his Jobseekers Allowance travelling to the Jobcentre to sign on and is struggling to meet these costs.

A client in the East of Scotland was required to attend the Jobcentre once a week. She was unable to attend two appointments as she could not afford the bus fare. She phoned them to inform them of this but they were unsympathetic. As a result of this, she was sanctioned and left with only £10 per week to live on. This meant it was unlikely she would be able to afford bus fares for subsequent appointments.

On integrated ticketing:

“I would like to see smartcards that can be used on multiple transport modes”.

“One smart card would be ideal and all transport integrated”.

“The worst thing is the lack of an interoperable smart card ticketing system. I need to visit my elderly parents, which can involve two companies, two apps, or let a bus go past because I haven't bought a ticket for that company”.

“An oyster card style system that incorporates all buses trains and subways would bring this city out of the middle ages”.

I also think it would be helpful to have a new ‘Oyster’ style travel card available in the Greater Edinburgh/Lothians area covering buses, trams and Scotrail train services”.

“It is a priority I think to look at an integrated ticketing system across all public transport providers”.