



URBAN TRANSPORT GROUP

Consultation Response

Bus Services Act 2017 - DfT Consultations

1. Bus Open Data

2. Accessible Information

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Jonathan Bray, Stephen Bellamy

Urban Transport Group
Wellington House
40-50 Wellington Street
Leeds – LS1 2DE
0113 251 7445
info@urbantransportgroup.org



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1. Introduction

About the Urban Transport Group

The Urban Transport Group brings together and promotes the interests of Britain's largest urban areas on transport. Our full members are Transport for West Midlands, Merseytravel (Merseyside), Nexus (Tyne and Wear), South Yorkshire PTE (Sheffield City Region), Transport for Greater Manchester, Transport for London and West Yorkshire Combined Authority. We also have associate members which are the West of England Combined Authority, Nottingham City Council, Strathclyde Partnership for Transport and Tees Valley Combined Authority however this response is on behalf of our full members. Between them our members serve over 24 million people.

2. Response

- 2.1. Urban Transport Group welcomes the proposed improvements to the provision of bus information outlined in the consultations on Bus Open Data and Accessible Information. Research has revealed the gulf between London and the rest of Great Britain in terms of bus information provision and availability¹. At a time of falling bus passenger numbers², the need to provide an accessible bus network that's easy to understand and navigate has never been greater.
- 2.2. This consultation response aims to highlight a number of broader issues in relation to the consultations. For Accessible Information, the key concern is regarding availability of funding for local authorities to meet proposed requirements. Funding is also a key concern in relation to the Bus Open Data consultation, as well as the ability to achieve high standards of data which is actually useable and legible for passengers.

Funding

- 2.3. Both consultations outline new responsibilities that will be placed on bus operators, but also local authorities. These responsibilities need to be understood in detail and resourced appropriately in order to ensure the vision outlined in the consultations is implemented.
- 2.4. Bus operators will be responsible for producing timetable and fares information to the DfT's data portal as part of the Bus Open Data proposals and also audio visual announcements on their buses as part of the Accessible Information proposals. Bus operators will need to undertake investment in order to meet the new requirements. Urban Transport Group recognises that the proposals represent a cost to the bus industry. However, as the consultation outlines, these new requirements have the potential to generate new sources of income for bus operators, for example, advertising via audio visual announcement systems.
- 2.5. Local transport authorities will also be required to undertake new duties as part of the proposals, including;
 - Provision of real time information feeds
 - Possible provision of an open data bureau service to ensure the quality of bus open data is maintained at a good level

¹ http://www.urbantransportgroup.org/system/files/general-docs/FactorsAffectingtheDeclineofBusUseintheMetropolitanAreas200804_0.pdf

² <https://www.gov.uk/government/statistics/quarterly-bus-statistics-january-to-march-2018>



- Audio visual announcement systems fitted to local authority funded secured bus services
- 2.6. These new requirements all represent a cost to local transport authorities at a time when local authority funding is under severe pressure. Some local transport authorities are already voluntarily providing some of these services to the industry. However, funding constraints may mean that these discretionary services could become unaffordable without direct external funding support.
- 2.7. For example, since 2010-11 there has been a 46% reduction in funding for supported bus services in England³. The requirement to install audio visual announcement systems, which can cost up around £3,000 to £4,000 per bus including audio recordings, could put some supported bus services at risk. The local authority would have to either directly invest in equipment for existing services, or specify a requirement for audio visual announcement systems in contract re-tenders. Both options will lead to additional costs for local authorities and the impact assessment included in the Accessible Information consultation fails to take into account the impacts on local authorities.
- 2.8. It is therefore imperative that suitable external and ring-fenced funding is provided to assist local transport authorities in implementing the new duties outlined in both consultations. Urban Transport Group would like to suggest the implementation of a Government Grant to help compensate local transport authorities for the cost of meeting these new requirements. Such a grant should be designed to be distributed on a fair basis that reflects actual costs rather than on a per capita basis.

Data Quality

- 2.9. In relation to the Bus Open Data consultation, the data provided as an output must be of high quality. Data must be accurate and up to date in order to ensure confidence with the end user; the passenger. The proposed distributed data publishing model places a considerable responsibility on bus operators to provide accurate data. The deregulated bus market is made up of a number of different types of bus operator; large multi-national corporations make up the majority of bus operators, but they are joined by small independent commercial operators and council owned municipal bus operators. The way operators deliver their service can be wildly different and as such, there is no guarantee of a consistent standard and quality of data to be provided by all bus operators.
- 2.10. Therefore, Urban Transport Group feels there is a strong need to introduce minimum quality standards to ensure all published bus open data is robust, reliable and consistent. Further, we feel the bus market is not able to achieve this outcome on its own and a third party will be required to check and update this data as required. Local transport authorities already perform some of this work through the existing production of public transport information and are best placed to adapt to measuring the quality of data provided by operators. However, appropriate funding would need to be provided to ensure local transport authorities have the resources to do this to a high standard.
- 2.11. Tackling such large data sets could prove intimidating and it is important to ensure that developers, who wish to make use of bus open data, do so in a manner that presents comprehensive and accurate information to passengers. Given that the information developers will be using is to be made available on a portal developed by the Government, it

³ http://bettertransport.org.uk/sites/default/files/research-files/Buses-in-Crisis-2018_0.pdf



is currently assumed that the Government will be responsible for developing an enforcement regime which obligates the developers to present data fairly and accurately. Local transport authorities could potentially also fulfil this function, but would be contingent upon additional funding from Government.

- 2.12. Nevertheless, Urban Transport Group feels that a strict and enforced code of practice must be put in place to ensure that developers meet the standards that we wish passengers to experience in the real world.
- 2.13. As alluded to in paragraph 2.9, the complexity of the deregulated bus market means that different operators, operating in similar geographies, can between them offer thousands of different ticket options and eligibilities. Urban Transport Group welcomes the mandatory duty for operators to publish fares and ticketing data, which may help to expose the complexity of the current fares and ticketing system. Developers are unlikely to use data sets that cannot be presented in an accessible way, and operators may therefore be encouraged to simplify their fare structures to enable developers to provide eligible information that allows passengers to make confident, informed fare choices and get best value for money.
- 2.14. We note that the consultation proposes a phased approach to the release of fares and ticket information, starting with a “limited number of fare and ticket types” such as single and return tickets. UTG does not believe that priority should be given to one type of ticket over another and all relevant information should be made available at the same time to allow passengers to make informed fare and ticket choices.

3. Conclusions

- 3.1. Both the Accessible Information and Open Data Consultations outline new responsibilities for local authorities. It is imperative that suitable external and ring-fenced funding is provided to assist in implementing these new duties.
- 3.2. Quality of data will be the key measure of success for the proposals outlined in the Open Data Consultation. The proposals outlined could unlock significant potential for buses to be promoted and advertised in a truly revolutionary way. However, if quality assurance procedures are not put in place, passengers could instead be facing a muddled and confusing array of data that helps to further perpetuate current bus patronage trends.