

June 2014



Bus Punctuality

**Towards
a structure
that can
deliver**

Extract from **The Maintenance of Headway** by Magnus Mills

*'But what about the maintenance of headway?' I asked.
'I thought that was supposed to be paramount.'*

*'The answer is fiendishly simple,' said Edward.
'They make sure every bus is late by exactly the same degree.'*

'In other words it's a conspiracy,' remarked Jeff.

'Correct.'

'So there's no point in trying to run on time.'

'None at all. The timetables are a complete sham. You've probably seen the notices at the bus stops: "Buses depart at these minutes past each hour." It's all meaningless: a line of dots and a set of random numbers; no more than a sleight of hand to fool the people.'

'They're not fooled,' said Jeff.

'Of course they're not,' said Edward. 'Neither are they ever satisfied. If the bus happens to arrive on schedule it's good for the public record but little else. Nobody believes the timetables. Waiting for buses is therefore paradoxical; hence the refrain:

*The people expect the bus to be late,
Yet they go to the bus stop early and wait.'*

Magnus Mills' 2009 short novel – the Maintenance of Headway – is probably the only work of fiction to be devoted to characters whose working life revolves around the intricacies and micro-politics of bus scheduling and operation. It's written about a different era on London's buses – before the wave of investment that came from Ken Livingstone's first mayoralty. And before the prevalence of technological aids that now monitor and aid the control of London's bus services. However, it shows how getting buses running on time is not as easy and straight forward as it might appear. Something that this report will fully explore whilst hopefully showing that the cynicism of some of the characters in the novel about bus performance regimes need no longer apply in the future!

Bus punctuality

Towards a structure that can deliver

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01 Introduction

Research regularly confirms that better bus punctuality is a key priority for passengers. A more complex debate, however, centres around what causes poor levels of punctuality, and where the responsibility or ability to influence improvement actually falls.

The objectives of this report are to summarise an understanding of current responsibilities and powers, examine the use of data sources for effective monitoring, analyse the perceived shortcomings in the current situation and, through challenging what does not appear to work well, to stimulate debate in order to achieve effective change.

Now is the right time to consider these issues seriously, following the Senior Traffic Commissioner's consultation on draft guidance and the need to follow up on the significant work undertaken by Passenger Focus over the last two years to identify the causes of poor punctuality. There is also greater Ministerial interest in 'open data' and the level of public funding invested in Real Time Passenger Information systems. The availability of such systems has the potential to fundamentally change information provision around bus services and could help inform a more effective future regime for bus punctuality, if the opportunity is seized now.

02 Bus punctuality

Why running the buses on times matters

The statutory watchdog for bus passengers – Passenger Focus – regularly carries out research on passengers’ priorities. This research shows that punctuality is passengers’ number one priority, and further, that their satisfaction with punctuality is lower than their overall satisfaction with their bus service. The last national Passenger Focus survey showed 78% satisfaction with punctuality compared with 88% overall satisfaction with their last journey.¹

If passengers value punctuality then clearly it also has to be a priority for bus operators; and time and again bus operators collectively and individually emphasise that achieving more punctual and reliable bus services should be a key goal of transport policy makers.

Local Transport Authorities also recognise the importance of punctual and reliable bus services – that’s why they invest in bus priority measures, and introduce and enforce parking restrictions which keep routes clear for buses.

How much do passengers care if their bus is late?

Recent in-depth focus group research² by Passenger Focus found that:

- Most passengers are quite forgiving about buses turning up late, feeling that there is little bus drivers can do to avoid the traffic. They see timetables as a ‘guide’ rather than a promise, spontaneously mentioning that giving them five minutes’ leeway feels about right.
- Passengers do not expect all buses to be on time and are prepared to ‘forgive’ occasional lateness so long as they perceive bus operators to be doing their best and not running buses that regularly turn up late, or ever leave early.
- The research suggested that passengers would prefer timetable information with more detail even if it is harder to remember. They expect it to reflect predictable changes in traffic conditions and accept that buses will sometimes have to wait at stops in order to stick to the schedule. But they do not want timetables to be ‘padded’ with extra time to ensure no buses are ever late, since this would result in most buses having to hang around, lengthening journey times unnecessarily.
- Passengers seem to distinguish between poor punctuality (represented by their bus turning up late at the start of their journey) and ‘delays’ (the bus arriving late at their destination). They are generally more tolerant, and less anxious, once on the bus. They would like bus operators to take any steps they can to help them manage their journey.

- Most passengers feel there is no point complaining to the operator either because they do not generally regard it as important enough to complain or because, when they have done so, they have not received a reply. None had heard of the Traffic Commissioners, but there was significant interest when they learned that such a body existed.
- Passengers feel that punctuality data, independently audited, should be published and made available to regulatory bodies even if most passengers have little appetite in searching it out. Some suggested that there might be a public relations benefit to operators from publicising that “more than 9 out of 10 of our services are on time” on the back of buses.

Why are buses late or unreliable?



What can impact on bus journey times?

- Time taken to physically board and exit buses – this varies considerably for a number of reasons other than simply the number of passengers.
- Time taken to deal with fares, cards and passenger enquiries – again, a small number of complex enquiries can have a significant impact on punctuality.
- Bus design not always conducive to effective passenger flows – conflicts still exist in many designs between those alighting and those boarding (particularly on single door buses).
- Drivers' ability to make up lost time safely and effectively (driving styles) – this is a difficult area, as there is a thin dividing line between driving styles which could be described as 'positive' and those that could be called 'aggressive'.
- Inadequate recovery time built into timetables – longer routes in particular require additional recovery time because of the greater chance of variability.
- Inadequate supervision and response to operational issues – achieving consistent punctuality requires adequate supervision and management time.

How do highways issues impact on bus journey times?

- Poor junction design or lane arrangements – delays caused by these factors are not always entirely predictable.
- Inappropriate traffic signal phasing – poor design can be improved by Local Highways Authorities, and can often be combined with bus priority measures.
- Re-entering traffic streams at bus stops – highway design changes can rectify this problem.
- Arrangements for entering and exiting bus stations.
- Lack of bus priority measures.
- Lack of enforcement – this is a frequent problem, especially when it involves factors such as illegal parking and obstruction of the highway.
- Poor planning of road works – most authorities have a formalised procedure for communicating and planning for the impact of road works, but this is not always the case.
- Inadequate planning of sporting events/demonstrations – it is often easy to underestimate localised congestion problems caused by these events.
- Inadequate arrangements at schools for dealing with parental parking etc.

Other issues that can affect bus performance

- General traffic volumes – these can vary from one day of the week to another. Even when more predictable, the practicality of infrequent services having different timetables for different days of the week presents added layers of complexity for users.
- Traffic signal phasing – variations in flows on different days of the week are not always accommodated on signal phasing timings.
- Road traffic accidents, broken down vehicles, burst water mains and utility interruptions and unforeseen road works – these are all obviously impossible to predict.
- Weather conditions – even with warning, the impacts of these are often difficult to predict.
- Refuse collections/street cleaning – essential services which can cause unplanned congestion.

Beware of what you wish for?

Although punctuality is key to running efficient and competitive bus services, it's also worth noting that if bus punctuality becomes the 'be all and end all' then there can be some unintended consequences.

For example, bus timetables can end up being slowed down to ensure the buses run on time. And sitting on a bus that's crawling along or waiting at stops to catch up time can be infuriating to passengers as they watch cars speeding past. It's called padding the timetable in the rail industry where the punctuality regime is linked to fines and incentives.

Timetables where buses run at the same time past the hour all day are simple, easy to remember and attractive to passengers. But given traffic congestion varies by time of day, a timetable that is all about ensuring punctuality could mean ditching regular interval services in favour of a more complicated timetable in order to accommodate for longer journeys at more congested times.

As more people use smartphones to obtain real time information to tell them when the next bus is going to be at their nearest bus stop, then for some users the traditional timetable may become less relevant especially on higher frequency routes.

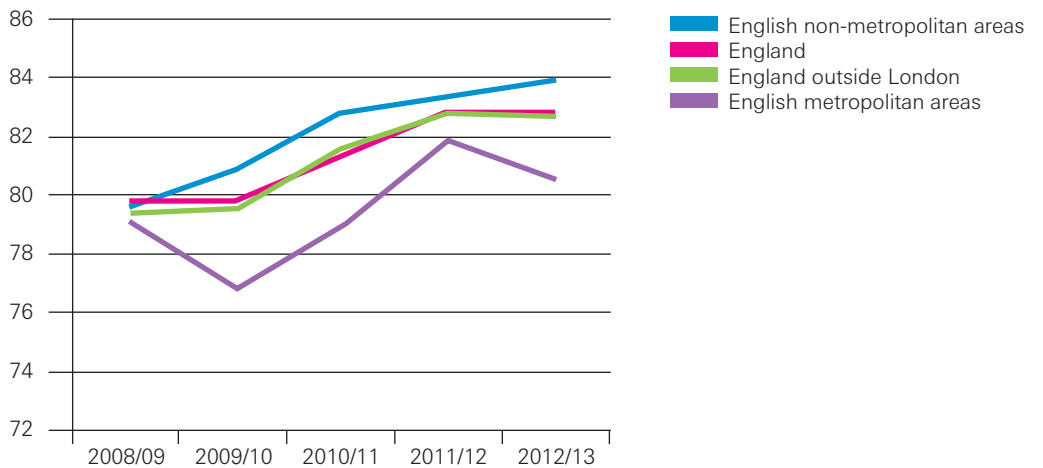
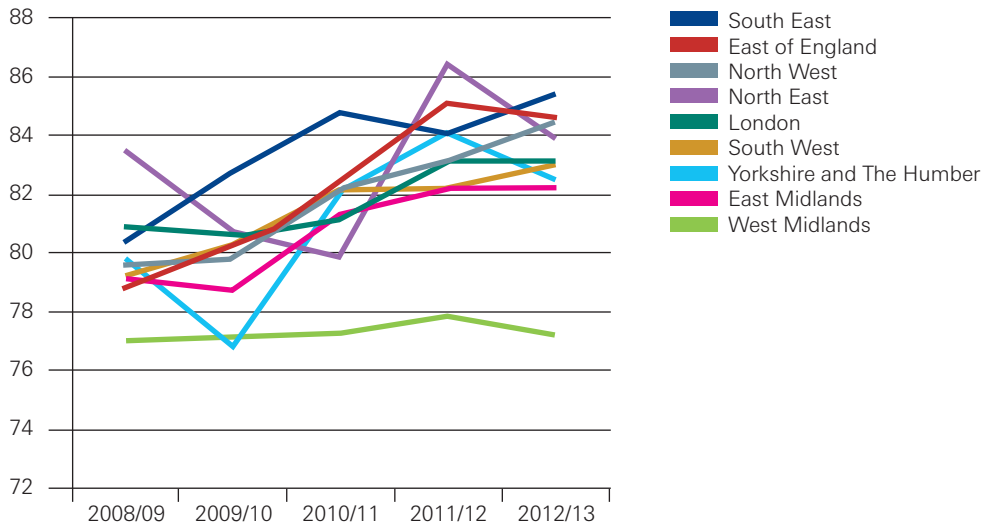
But despite these complications and reservations it's clear that punctuality matters for passengers and therefore should matter to bus operators, Local Transport Authorities and to national Government.

How do bus services perform anyway and where does the balance of responsibility lie when they perform poorly?

Firstly it should be noted that the availability of data about bus performance is limited; and the availability of analysis of causes even less so. Certainly when compared with the situation on rail (see page 14).

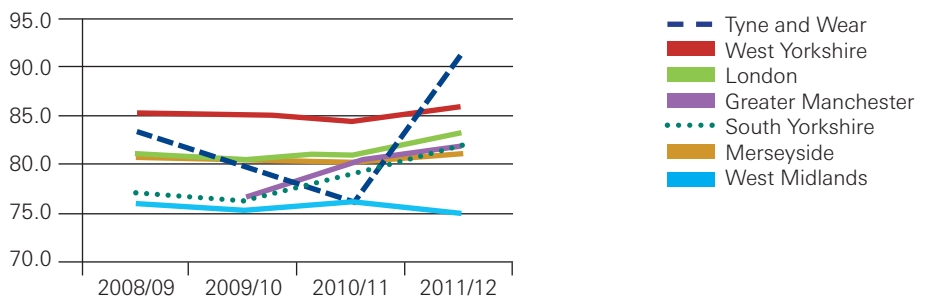
The main source of data is from the Department for Transport (DfT) who publish annual local bus punctuality statistics by Local Transport Authority area on the DfT website.³ At this level it is clearly highly aggregated and of only limited value given the very local nature of bus services. However, this data suggests that performance has improved.

Percentage of infrequent bus services running on time

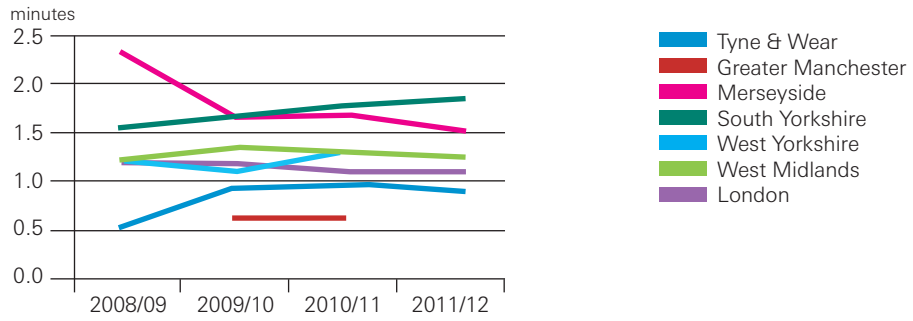


The following charts show figures for infrequent and frequent bus services in London and the Metropolitan areas.

Percentage of infrequent bus services running on time



Average waiting time for frequent bus services



In terms of identifying the causes of bus punctuality problems the value of this data is clearly very limited.

Passenger Focus undertook a research project⁴ (which concluded in 2013) to look in detail at a sample of routes in different parts of the country and in different operating terrain. It concluded that:

'While not representing a statistically valid sample of the country's vast variety of bus routes and operating environments, our case studies have served to highlight the challenges of setting timetables to reflect variable patterns of traffic and patronage and thrown up a number of recurrent themes, including: traffic and parking, boarding and alighting, inadequate recovery time and, perhaps most surprisingly, exiting bus stations.'

'Everyone seems to agree in principle that getting the buses to run on time is the key to increasing passenger numbers, profits and passenger satisfaction levels. So it has been disappointing how long it took us to get this project off the ground in some areas. We have also been surprised to discover the lack of consistency about which services are monitored and how this is done, a lack of consistency which even characterises the approach taken within some companies.'

The DfT formerly produced statistics for London and the rest of England showing comparative impact of various factors on reliability (although not punctuality).⁵ These showed that in regulated London (where there has also been considerable investment in bus services in recent years) factors under operators control were substantially reduced and that traffic congestion became the biggest factor. Outside London overall lost mileage was reduced over time, but with factors under operator control consistently the biggest cause (although falling over time).

Causes of lost scheduled bus mileage



What we can conclude then is that:

- The publicly available national data on bus punctuality is limited (and data on the causes of bus performance problems is even weaker). To some extent given the very local nature of bus services, this is perhaps unsurprising. However it is still disappointing given that Automatic Vehicle Location data is now widely available, and given that bus punctuality is supposed to be a major priority for Government, operators, passengers and Local Transport Authorities.
- What national data there is suggests that bus punctuality has improved in recent years.
- In large urban areas, for infrequent bus services, there does appear to have been a small improvement in most areas since 2008, but for frequent services, the same period has mostly seen mixed results.
- At the same time the targets set by the Traffic Commissioners for punctuality are not being met (see section three) and of course statistical averages are of scant consolation to any passenger who is waiting in the rain for their bus to arrive.
- If we look to the future, then on the plus side the move to smart ticketing should reduce boarding times. On the other hand the Government is predicting a 40% increase in traffic, which, if it is anywhere near accurate, suggests increasing traffic congestion.

03 Everyone says punctuality matters but...

How the formal punctuality regime is supposed to work on buses

In a nutshell...

The Traffic Commissioners were established in 1931 and are responsible for overseeing and enforcing standards for the punctuality and reliability of local bus services. They can hold public inquiries into the punctuality and reliability of a bus company's services, and can sanction operators as a result. They work at arms' length from the Department for Transport, and its agencies, and act in a judicial capacity when conducting inquiries.

There are seven traffic commissioners (one of whom is the Senior Traffic Commissioner) who are appointed by the Secretary of State for Transport. They have responsibility in their region or country for the licensing of the operators of heavy goods vehicles, buses and coaches; the registration of local bus services; and regulatory action against drivers of HGVs and PSVs. The seven commissioners regulate eight geographical areas.

But...

The Traffic Commissioners have very limited resources and another Government agency (The Driver and Vehicle Standards Agency - DVSA) carries out bus service performance monitoring. In addition the Traffic Commissioners operate a one-size fits all bus punctuality regime which is rarely achieved and rarely enforced.

Divided responsibilities, limited resources, and a fractious relationship

Traffic Commissioners rely on DVSA staff to monitor maintenance standards and the punctuality of bus services. The Vehicle Operator and Safety Agency (VOSA) provided this role until it was merged with the Driver Standards Agency to become the DVSA in 2014. The relationship between the Traffic Commissioners and VOSA has been fractious over the years. In her foreword to the latest annual report (2012/13)⁶ of the Senior Traffic Commissioner, Beverley Bell, says: 'VOSA still has a long way to go in delivering an effective enforcement regime.'

The last House of Commons Transport Select Committee report on VOSA⁷ said:

'During this inquiry, there was a worrying conflict between evidence from the Senior Traffic Commissioner and that from VOSA's Chief Executive and the Parliamentary Under-Secretary of State for Transport. On a number of occasions the Senior Traffic Commissioner said she had raised issues with VOSA and the Department for Transport only for them to say they had not heard the concerns before. There are clearly significant communication problems which urgently need resolving.'

'The Traffic Commissioner's reliance on VOSA staff is problematic. We accept that the July 2012 Framework Document has done much to clarify the relationship between VOSA and the Traffic Commissioners in recent years but it is apparent that more needs to be done. VOSA's Chief Executive said the relationship between VOSA and the Traffic Commissioners "has not always been a marriage made in heaven" while the Senior Traffic Commissioner said "We are trying very hard to make it work". We believe these problems are not going to go away by themselves.'

In addition a new system has been in place at VOSA, now DVSA, for the last two years, whereby a formerly dedicated team of thirteen Bus Compliance Monitors (which was already inadequate for the scale of the task) covering England and Wales was subsumed into a relatively small team of Bus Operator Account Managers (BOAMs). This was supplemented by training some 70-80 of the 600 strong team of Traffic and Vehicle Examiners to have the skills to be categorised as Bus Compliance Officers (BCOs). This role is in addition to their primary role as vehicle examiners, and they are used on an ad hoc basis for bus compliance duties as and when required.

The main role of the BOAMs is to promote partnership working; to check management and engineering systems work correctly; to undertake education and enforcement if necessary; and to provide greater engagement with operators. Their objective is to agree improvement plans and re-visit operators to ensure actions have been taken. Vehicle safety issues are the priority focus of activity for DVSA's inspectorate staff, and DVSA has confirmed that the amount of regular, routine monitoring of bus services is currently minimal. In the Senior Traffic Commissioner's evidence to the last investigation into VOSA by the House of Commons Transport Select Committee she said she believes the change of role has failed and in practice has resulted in *'Vehicle Examination Officers simply advising the bus industry how to improve bus services'*.⁸

Overall it is clear that VOSA's role on bus service monitoring was not a key priority for the organisation (it is not referred to or commented on in its last annual report for example).

One-size fits all punctuality regime

The minimum current standards set for punctuality by the Traffic Commissioners are that services should depart from the journey starting point within a window of tolerance of up to one minute early and up to five minutes late and a target that 95% of all services should achieve this. At other timing points, the minimum standard which an operator will be expected to attain is that 70% of buses will depart within a window of tolerance up to one minute early or up to five minutes late.⁹

For frequent services (where the service interval is ten minutes or less), services should on at least 95% of occasions have:

- Six or more buses departing within any period of 60 minutes.
- An interval between consecutive buses not exceeding fifteen minutes.

At the time of writing the Senior Traffic Commissioner is currently proposing to make these standards more lenient, with the window of tolerance stretched from five minutes to seven minutes late.

The current draft Senior Traffic Commissioner guidance¹⁰ recognises that different operating conditions occur in different parts of the country and that these should be addressed to some extent by local partnerships between Local Transport Authorities and operators to address punctuality issues.

'It is recognised that it will be appropriate in some instances, following the benchmarking of data, for the partnership between operators and local transport authorities to initially agree a lower target but with comprehensive and regular reviews being carried out to ensure that the final compliance rate that is achieved is as high as possible taking account of all of the external factors that prevent operators from achieving full compliance with the registered particulars. Consequently partners are encouraged to set and strive for stretching targets and provide full justification where this is not considered possible.'

However, in effect there is still a one-size fits all approach: from rush hour urban services (which could be badly affected by traffic congestion); to off-peak or rural services, where it is difficult to understand why it should be satisfactory for bus services to run early, or up to seven minutes late.

It's also worth noting that in many parts of the country the punctuality regime is based on punctuality targets which are rarely achieved. In terms of the DfT performance statistics across England over the five years, there are 440 records of annual punctuality performance by local authority (the average score of which is 81.8%). There are however only fourteen occasions (representing just 3.2% of records) where punctuality is recorded at or above 95%, and the relatively small unitary authorities of Swindon and Bracknell Forest account for three of the fourteen records each.¹¹

A largely unenforced punctuality regime

Despite the fact that the Traffic Commissioners' punctuality standards are rarely achieved, the paucity of resources and dysfunctional enforcement regime means that enforcement is weak, and in some areas of the country non-existent. The latest Traffic Commissioners' Report (for 2012-13)¹² shows that a total of four public inquiries were held in England and Wales in 2012-13 (down from fifteen in the previous year); that one restriction on licences was imposed (with none in the previous year); two penalties (compared with thirteen in the previous year) and no formal warnings given (compared to two in the previous year).

In his annual report for 2012/13 the Traffic Commissioner for Eastern England sums it up: *'Without an effective enforcement agency regulation risks becoming an empty ritual; by way of example, in the last year there were no Public Inquiries in this Area to consider action against local bus service providers.'*

How bus punctuality issues are supposed to be tackled

Alongside the formal punctuality monitoring and enforcement process, the DfT and the Senior Traffic Commissioner promote the establishment of partnerships between Local Transport Authorities and bus operators to address punctuality issues.

In 2011 the DfT issued new guidance on bus punctuality partnerships.¹³ The executive summary said:

'This document, issued by the Department for Transport (DfT), has been produced by the Bus Punctuality Working Group, a stakeholder group set up under the umbrella of the Bus Partnership Forum to develop a more effective punctuality regime. The Bus Partnership Forum is the main stakeholder group for the bus industry. The Bus Punctuality Working Group consists of: Association of Directors of Environment, Economy, Planning and Transport (Adept), Association of Transport Co-ordinating Officers (ATCO), Confederation of Passenger Transport UK (CPT), DfT, Local Government Group (LGG), Passenger Focus, Passenger Transport Executive Group (PTEG), the Senior Traffic Commissioner, the Vehicle and Operator Services Agency (VOSA) and the Welsh Assembly Government.'

The guidance updated 2004 guidance on Bus Punctuality Improvement Partnerships (PIPs). The 2011 guidance said:

'Bus punctuality partnerships are broadly similar to PIPs in that they place a commitment on bus operators (there can be more than one in the area) and the local authority (local traffic and transport authorities) to work together on issues affecting bus punctuality, and to identify any problems and solutions through the production of a punctuality partnership plan.'

The draft Senior Traffic Commissioner guidance¹⁴ is also very clear on the need for bus punctuality partnerships.

'DfT guidance makes clear that partnerships need to be open and transparent to all, and that instances of partnership working should be notified to the relevant traffic commissioner. Ideally, details of the partnership would be recorded, for example in a plan, and made available (just because the details are recorded does not make it a formal agreement). Whilst it is not necessary for partnerships to be documented, if there is no written record it will be harder for operators and local authorities to demonstrate to a traffic commissioner's satisfaction that they are doing all they can to improve punctuality. It is to be noted that punctuality partnerships can be most effective if they encompass all operators on a corridor or within an area as most local problems will be common to all local operators.'

However, in practice, it is not clear to what extent PIPs or Bus Punctuality Partnerships are in place across the country, how well they operate or even if a partnership that only covers highways issues in relation to buses is necessarily the best option.

For example, during the research for this paper, it has been difficult to discover any evidence that the existence of PIPs / Bus Punctuality Partnerships has been registered with the Traffic Commissioners, or that there is a central register kept of such partnerships.

Contact was made with the Central Licensing Office of the Traffic Commissioners in Leeds to obtain a current list of partnerships. The office was unable to provide a comprehensive list of any partnerships of which any of the Traffic Commissioners had been informed, and did not appear to be aware of the requirement to do so.

Soundings with Local Transport Authorities suggest that:

- Where PIPs were established they have sometimes lost momentum particularly as it's Local Transport Authorities that supply the secretariat and resource. Funding cuts for local government mean that non-statutory functions like PIPs can be particularly badly affected.
- Informal communication between Local Transport Authorities and bus operator staff based on custom and practice and long standing relationships is often preferred.
- Bus performance issues are being tackled within wider forums – such as within wider bus partnership agreements (such as in Sheffield) or as part of wider highways forums (such as in Greater Manchester).

Overall then, despite the 2004 PIPs initiative, and 2011 Bus Punctuality Partnership follow up, it's very unclear how many areas have a formal partnership arrangement, with an action plan, regular meetings and a record of actions and achievements (in line with the 2011 guidance). It's also therefore unclear how effective this approach has been. There also appears to be limited structured engagement between the partnerships and the Traffic Commissioners.

More than a PIP – the Greater Manchester approach

In Greater Manchester, the PTE (TfGM), the ten highway authorities and the police meet on a regular basis as part of the 'Greater Manchester Combined Authority Network Management Partnership'. Bus performance is a regular agenda item with operators providing feedback on highways issues to TfGM who in turn provide tailored reports to individual districts on highways issues that are affecting bus performance. Districts use this feedback to help inform their future investment programmes as well as their day to day maintenance activities. The Network Management Partnership has also helped to develop a series of Quality Partnership Schemes as well as working together to inform joint responses to consultations, like those from the Senior Traffic Commissioner.

A group of operators also now attends the regular Greater Manchester Traffic Manager meetings so that bus operators' priorities can be reviewed at a cross-boundary level, facilitating consistent responses and the sharing of best practice. Within a large and complex urban environment such as Greater Manchester it is recognised that highway performance needs to be reviewed at a route level, both in terms of the highway and also in terms of bus routes, which often cross several local authority boundaries.

The approach in Greater Manchester has been to improve overall performance of highways and the bus network that uses them as well as focusing attention and investment on the most challenging parts of the network for highways management and bus performance. This approach has led to consistent year on year improvement in both bus, and wider highway, performance.

The next step will see major highway and bus corridors benefit from the installation of journey time monitors to allow 'active network management' strategies to be deployed at different times of the day to improve journey time reliability. Combined with bus Automatic Vehicle Location data, these data sets will provide greater visibility of network problems and enable better management of the network as a whole in the future.

An instructive comparison: national rail

Trains operate on more of a 'closed system' than bus services which are clearly not the sole user of the road network. Nonetheless it is notable that the rail punctuality and reliability regime is characterised by:

- Significant resource devoted to the analysis and attribution of delays to services linked to a penalty regime.
- Clear compensatory arrangements for passengers related to performance data (which is in the public domain).
- A transparent and statutory system for complaints from passengers about delays.

The UK railway operates two core punctuality and performance regimes – one is internal and within the industry, whereas the other is used to inform customers of the levels of punctuality on the railway. In principle, the first one (the Delay Attribution Regime) is used to define the quantity of compensation payments to operators for delays caused. The other, known as the 'Public Performance Measure' or PPM, is used to define the level of discount for season tickets.

The PPM is a measure designed to inform passengers of the overall punctuality of their train services. The PPM is measured as a percentage and reports two figures:

- Delays: the percentage of trains which are late as per the definition of lateness (see below).
- Cancellations and Significant Lateness (CaSL): the percentage of all trains that are fully or part-cancelled or over 30 minutes late as per the definition below.

A train is defined as being 'late' if it arrives at its final destination later than the time shown in the timetable. The thresholds of punctuality are as follows:

- Up to five minutes for regional and London & South East services.
- Up to ten minutes for long-distance services.

Each franchisee has agreed PPM targets (measured as a Moving Annual Average to take account of periods of serious disruption or bad weather) that the DfT expects them to meet. Failure to meet those levels leads to penalties being levied by the DfT.

Passengers are also offered compensation for delays, as follows:

- Delay of up to 30 minutes: no compensation.
- 31-60 minutes: refund of 50% of single-leg ticket (paid in vouchers which can be used to buy rail tickets in future).
- 60-120 minutes: refund of 100% of single-leg ticket (also paid in vouchers).
- 120 minutes and above (including cancellations): Refund of 100% of single or return ticket.

Season ticket holders are also offered compensation if the PPM measure drops below a certain threshold (agreed between franchisee and DfT) on the route they are using. This compensation is either offered in cash, or as a discount when buying the next season ticket.

The PPM is, as the name suggests, public, and is communicated in a variety of ways:

- On the Network Rail website (punctuality shown by train operator).
- On the Office of Rail Regulation website (published annually).
- On each of the operators' websites (where the season ticket discount threshold must be shown in their passenger charter).
- On posters at certain stations.

Operators sometimes also choose to use performance figures in their advertising campaigns. For example, c2c have recently used their results to claim they were 'as punctual as Swiss railways' in order to attract new custom and reinforce a positive image amongst existing customers.

The Passenger Focus watchdog organisation also conducts a biannual National Rail Passenger Survey (NPS). The NPS contains a question about passengers' perceptions of punctuality and reliability. The NPS results are published on the Passenger Focus website.

As described above, the Public Performance Measure is the score communicated to rail passengers and on which franchisees are judged by the DfT. According to Network Rail, the performance during the first decade of the millennium improved consistently, measured by the Moving Annual Average, but has since plateaued at just over nine out of ten trains running within PPM thresholds.

While the 'Right Time' measure has improved much more rapidly, it started out from a much lower base, and has also plateaued, in this case at around two-thirds of trains operating to time at intermediate stations. It should also be noted that Network Rail cautions that *"the process for gathering data of this accuracy is currently not 100% reliable and the industry is working on improving the quality of this information to make right-time data more reliable"*.

Publicly funded bus punctuality data – kept secret!

Eighty-three per cent of the fleet in England (outside London) is now equipped with Automatic Vehicle Location (AVL) equipment, with the percentage increasing rapidly since 2010¹⁵. AVL equipment is a pre-condition of being able to provide passengers with Real Time Information about when their bus will arrive (either at screens at bus stops or via handheld devices or PC). It also allows for more effective route management. In addition it provides a mass of in-depth data on how bus routes have been performing. This data can be useful in identifying patterns and incidents which can contribute to tackling problems.

The public sector has made a significant contribution to AVL being fitted on buses. Since April 2010, and in order to encourage the uptake of AVL, bus operators have been incentivised by an uplift of 2% of the DfT's Bus Service Operators' Grant (BSOG). Sixty-six operators are currently listed as claiming the AVL uplift with 161 claiming the AVL uplift alongside the equivalent Smartcard uplift.¹⁶

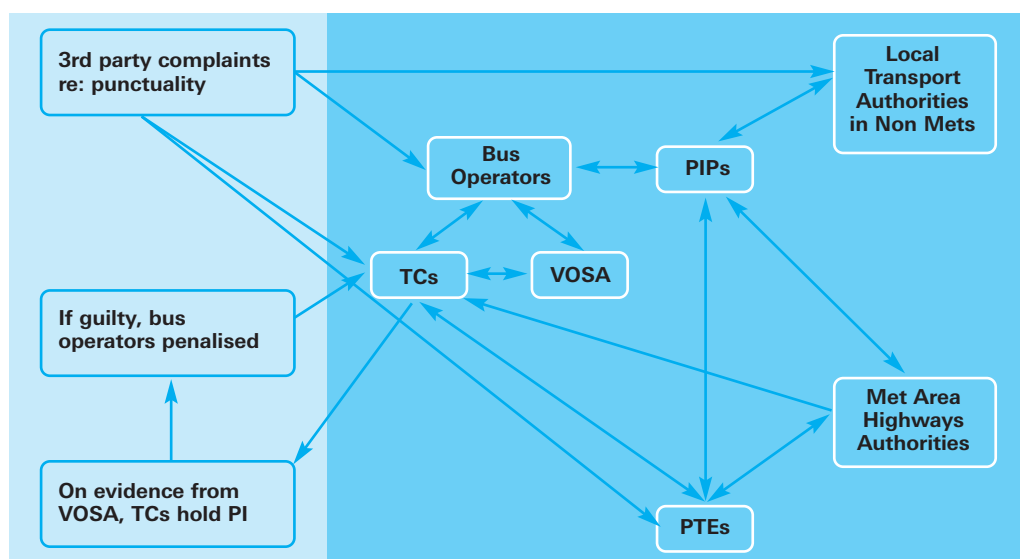
Yet the information on punctuality generated by the AVL equipment is commonly subject to gagging clauses by operators in contracts on its use with Local Transport Authorities so that neither the Traffic Commissioners, bus users (or their statutory representatives – Passenger Focus) can access it. This approach to the use of AVL data is in effect endorsed by the 2011 Bus Punctuality Partnership guidance which includes a model template – complete with gagging clauses on the use of the data!

The reasons given by operators for keeping the data secret usually relate to concerns about bad publicity or that the Traffic Commissioners will use it to take action against them. Or, slightly more reasonably, that the volume of data that AVL systems generate is too great to be easily handed over in a digestible form.

The latter is an issue – although unlikely to be insuperable. The former makes no sense in an era of open data and open government – even if there was much evidence that the bus punctuality regime was being enforced.

There is another problem too. The specification by DfT of what qualifies as AVL equipment is too lax. Some of this equipment just isn't up to the job of providing the data that would allow for proper performance analysis.

The bus punctuality regime



Bus passengers in the dark

Availability of performance information to passengers

Air	Rail	Bus
Monthly or annual	Period or annual	Annual
By operator	By operator	By local authority
By Route	By sub-operator Public Performance Measure	No further breakdown
Search through data on CAA website	At stations and on operators' and Network Rail's websites	Search through data on DfT websites (and some local authorities' and operators' websites)

Before summarising the situation for bus passengers outside London the following comparative arrangements for users provide some context.

Bus users in London

- Access to information on how London's buses are performing on a dedicated section of the TfL website.¹⁷
- A transparent clear and well advertised route for complaints which all go to Transport for London and if passengers are not happy with the response they can go to the statutory watchdog – London Travelwatch.

National rail users

- Punctuality data widely available – including displayed at stations.
- Punctuality standards linked to compensation arrangements for both individual journeys and for season ticket holders.
- A transparent clear and well advertised route for complaints which go first to operators and if passengers are not happy with the response they can go to the statutory watchdog – Passenger Focus.

Outside London, not only are passengers generally kept in the dark about how their bus services are performing but the arrangements for complaints about performance are far weaker than for buses in London or for national rail.

The arrangements are not always clear or well advertised and complaints will most commonly be directed to operators who may well have very different standards for handling them. There is also no appeal option to a statutory watchdog (unlike for bus users in London or for national rail users). Instead there is the industry funded Bus Appeals Body which, it is fair to say, does not enjoy the same level of awareness or public confidence that Passenger Focus does among rail users, or London Travelwatch does among all transport users in London.

Passenger Focus' recent work¹⁸ has shown that bus passengers outside London have very little awareness of the Traffic Commissioners and the wider structure of the punctuality regime in which they sit. They also have limited faith that any complaints they might have about punctuality would be addressed even if they knew who to complain to. They did feel that punctuality data, independently audited, should be published and made available to regulatory bodies.

A broken system

So overall the bus performance regime has the following characteristics:

- It's based on one-size fits all punctuality targets that don't reflect local circumstances.
- The statutory regime for enforcement is under-resourced to the point where it isn't enforced at all across large swathes of the country.
- Responsibility for statutory enforcement is divided between two bodies that have a fractious relationship and where the body responsible for collecting evidence on punctuality issues sees it as a very low priority.
- There is data in abundance (collected by publicly subsidised equipment) on how bus routes are performing but this is kept secret from the statutory bodies responsible for the punctuality regime – an arrangement that is effectively endorsed in DfT guidance.
- The industry / Traffic Commissioner / DfT / local government endorsed approach to resolving bus punctuality problems is through area forums (with action plans) of the interested parties. However the extent and record of these forums is unclear – and the Traffic Commissioners do not appear to have a structured understanding of where they exist.
- Bus users are kept in the dark about how their services are performing; generally have no idea who the Traffic Commissioners are or about their role in the punctuality regime; and have little confidence that any complaints they might have about punctuality will be addressed.

In short this is a system that is opaque and dysfunctional. It is a strange world of its own which few people understand – although no doubt some of the more cynical readers of the Magnus Mills novel 'The Maintenance of Headway' would have savoured some of its arcane absurdities!

04 Towards a structure that can deliver

Although this report so far has argued that the current structure is dysfunctional, that is not to say that there aren't some complex and difficult challenges that any system would need to address. In this section we summarise these challenges and set out some ways forward. Note that this section is also based on the current deregulated structure of the bus industry outside London.

A. Bus operator accountability and information provision

The challenges

Unlike the logistics and freight industry many bus operators still have no Automatic Vehicle Location (AVL) equipment to tell them where their vehicles are. Where buses do have AVL fitted the information it generates is often not being used as effectively as it could be in managing punctuality – both in terms of factors that are within and outside operators control (such as identifying pinch points on the highway network). Nor is this information being made available to regulators and passengers.

Towards solutions

There needs to be a more concerted effort by DfT to derive the maximum benefits from their investment in supporting AVL. The DfT could undertake a review of the minimum standards that AVL systems should meet – including on data generation; and how the data that AVL systems generate can be best formatted in a way that meets the needs of various interests. These interests include: Local Transport Authorities; the Traffic Commissioners and Passenger Focus; passengers; and for DfT statistics. The outcomes of that review could be fed back into BSOG conditions and/or operator licensing conditions.

Making the best use of AVL data could be a key driver for change so that the current regime could evolve to put responsibility on the operator to report its punctuality data. This would allow future regulation to mature based around auditing the operators' own monitoring, performance and management processes, including how they have addressed issues with other parties (including highway authorities).

There is much interest at present in open data, and the use of that data by third parties to generate useful applications for analysis and passenger information. So far AVL data for bus services outside London has been sealed off from this wider debate. Agencies like Catapult could have a role in introducing AVL data into this wider world.

B. Highways issues

The challenges

The way in which highways are managed clearly has an important role to play in bus punctuality - from the management of roadworks to parking enforcement, and from the allocation of scarce capacity to the organisation of one off public events.

However, democracy means that politicians can introduce policies that, directly or indirectly, harm bus provision. From national politicians seeking to end what they see as a 'war on the motorist' by relaxing parking enforcement, to local politicians removing bus lanes on the basis of 'gut instincts'. It's not easy to see how it would be possible to prevent politicians being elected on a mandate (either explicit or implicit) to take decisions on highways issues that have a deleterious effect on bus punctuality. In short democracy seems unlikely to be abolished to make the buses run on time.

Even in the absence of the more contentious political decisions which effect bus services, highway authorities need to have regard to the needs of all road users – cyclists, pedestrians, car users, vans and lorries – as well as buses. Addressing all these constituencies in an entirely separate way is unlikely to be an efficient use of limited council officer resource, nor will it provide lasting solutions.

In the metropolitan areas there is a division of responsibilities between buses (the responsibility of the PTE) and the highways (the responsibility of the District Councils)¹⁹. Governance change in the city regions that is currently underway may see a more cohesive approach unfold but at present a PTE can't guarantee the actions of its constituent District Councils nor can it ensure an entirely consistent approach across District boundaries.

The generic case for bus priority measures has not been well made by the bus industry or by local government. There is a paucity of general materials available for local stakeholders (from politicians to business organisations) which make the case for these measures (other than to support the implementation of specific local schemes). There needs to be more emphasis on publicising the wider social and economic benefits for local communities that can be delivered by improved bus priority and punctuality.

Local government cuts means there are fewer officers available to manage the complex day-to-day issues around highway management and deliver capital schemes which benefit bus punctuality. Given the scale of cuts still to come, this is likely to get worse.

Towards solutions

Whilst it is inevitable that politicians will continue to stand for election on highways policies that may adversely affect bus provision, and trying to micro-manage highways from Whitehall would be absurd (especially in an era of localism), there are supportive measures that Central Government could consider:

- Central Government funding streams for bus priority schemes could require a process of review and consultation in the event that it is subsequently decided locally that those bus priority schemes should be materially altered in a way that could be detrimental to bus punctuality. If the bus priority scheme is subsequently altered then there should be an evaluation process on the impacts. Alternatively, Local Transport Authorities could be required, in return for Central Government funding for bus priority schemes, to have an established and published framework for reviewing and evaluating the impacts of bus priority (including for changes to that infrastructure). If that framework was not followed then Central Government could seek to reclaim the capital costs.
- Central Government could issue additional guidance in relation to local government's Traffic Management Act responsibilities to the effect that Local Transport Authorities should provide their local Traffic Commissioner with a summary of what formal arrangements exist with bus operators to identify and tackle bus punctuality issues and to what extent these are in line with the 2011 guidance on bus performance. These arrangements could form part of a wider highways forum, or for smaller local transport authorities which do not have the resources to set up a forum which meets the 2011 guidance requirements, it could be a baseline minimum requirement to write to the Traffic Commissioners on an annual basis setting out what arrangements exist. The Government could reserve the right to ask the Traffic Commissioners for details of Local Transport Authority submissions in relation to any future policy decisions that relate to bus funding. The Government could also remind LTAs that a failure to establish effective partnership arrangements can be taken into account by Traffic Commissioners at any public inquiry (as set out in the Senior Traffic Commissioner's draft guidance). Traffic Commissioners might also consider making these documents available on a dedicated website to assist in the sharing of good practice and experience.
- The overall coherence of strategic decision making on highways should be one of the issues Government considers when promoting or approving further governance reform in the Metropolitan areas.
- The sub-group of the national bus partnership forum on punctuality could be charged with maintaining and disseminating the evidence base on the benefits of bus priority measures.

C. Devolution, partnership and enforcement

The challenges

It clearly makes sense to have a partnership forum between all the interested parties on bus punctuality to address and resolve bus punctuality problems – in line with DfT and Senior Traffic Commissioner guidance.

If it is accepted that un-enforced and un-met national one-size fits all punctuality targets do not make sense then there is a strong case for the bus punctuality regime to be devolved so that it can be devised in a way which is consistent with local operating conditions. Such regimes could take account of the difference between rural and urban, peak and off-peak, and any special circumstances that affect certain routes (such as particularly heavy congestion). Any penalties associated with the local punctuality regime could be recycled into improvements which benefit local bus services and their users.

However, this raises issues around:

- The Local Transport Authority being judge, jury and executioner on bus punctuality whereas the Traffic Commissioners exercise an independent judicial role in relation to the punctuality regime. These issues become particularly acute where the Local Transport Authority could (or could be seen) to be attributing responsibility for delays to operators where highways issues were the primary cause, or where a local authority could (or could be seen) to be using fines from operators as an income stream for its wider transport spending plans.
- Operators may find it difficult to feel they are in a partnership of equals and sharing information if they know the Local Transport Authority will also be acting in a judgement and enforcement role.
- Large transport authorities may be happy to take on the role of devising and enforcing the local performance regime but smaller authorities may have neither the resource or the wish to take on such a role.

Towards solutions

If we assume that the regulatory regime for performance is not devolved – nor wholly devolved – then...

Given that rail has arrangements for the regulation of safety and performance that are more transparent, effective and more highly resourced than bus, there is a case for further consolidation of the safety and regulatory regimes for rail and for road vehicles. This would allow for operational efficiencies, provide the bus sector with access to resources it is unlikely to gain as a stand-alone sector, and create a more unified and transparent system for transport users.

A less radical, but still significant option, would be for responsibility for investigation of poor bus performance to be transferred from DVSA to an arms' length agency of the Traffic Commissioners. A firewall between the investigative agency and the Traffic Commissioners would allow the Commissioners to retain their judicial independence as far as public inquiries are concerned while an investigative agency specifically devoted to bus performance could develop a professional expertise and focus that the current arrangements appear to lack. It would also address the problems that persist in the fractious relationship between DVSA and the Traffic Commissioners on bus performance enforcement.

If the case for devolution is accepted then there are various ways in which this might be done.

A Local Transport Authority could operate a local performance regime under licence from the Traffic Commissioner with the local Traffic Commissioner approving the performance regime if it was satisfied with that regime and the capability of the Local Transport Authority to implement it. The Traffic Commissioner could also act as enforcement body for the local performance regime (ie it would institute any public inquiries and determine any sanctions) or it could act as the appeal body for any appeals by operators against a Local Transport Authority decision.

A 'third way' could be for a Local Transport Authority to have the power to trigger a review by the local Traffic Commissioner of the performance regime in its area. Following a consultation by the Traffic Commissioner, the Local Transport Authority would then set a specific performance regime to reflect local circumstances.

D. Resourcing

The challenges

The Passenger Focus work on bus punctuality showed how intensive in terms of management and staff time it can be (for both operators and a Local Transport Authority) to address performance issues on a single route (given the different factors that can affect individual routes). What's more, although a burst of investment or attention for a particular route (such as new bus priority measures or a more robust timetable) can bring results, new problems will arise over time which will also require resources (including staff and management time) devoting to them. However, many bus operators have very lean management structures with limited resources for addressing the complex and overlapping issues around the performance of routes and networks. As discussed above, local government resourcing is also being reduced and both DVSA and the Traffic Commissioners operate on a shoestring as far as bus punctuality is concerned. If it's accepted that addressing bus punctuality issues is time consuming, but there is a limited (and diminishing) resource available, then how can this circle be squared?

Towards solutions

The under-resourcing of the bus performance regime is typical of the under-funding of bus services (outside London) more widely. Whilst rail budgets are protected in long term funding deals, and the budget for national road building soars, local bus services are seeing big service reductions as local government withdraws supported services in response to wider local government cutbacks. There is a strong case for local bus services outside London to have a greater share of overall DfT spending – including the resources available to ensure a more effective punctuality regime.

More effective use of Automotive Vehicle Location data could contribute to the creation of a more efficient bus performance regime through some switching of resources from manual monitoring, and less well informed actions, to analysis of data and better targeted action.

Some consolidation of rail and road vehicle regulatory bodies could also benefit bus given that the rail regulatory bodies and performance regime starts from a much higher base in terms of resources.

Bringing it all together

- There is a strong case for local performance regimes that reflect local circumstances and which can be based on stretching but realistic standards (rather than the blunt instrument of one-size fits all national standards which are rarely achieved or enforced as is the case at present). This could be done by devolving the performance regime to Local Transport Authorities that have the capacity, capability and desire to do it. However, there would need to be checks and balances to ensure that operators are treated fairly, and seen to be treated fairly, by Local Transport Authorities and to ensure that a collaborative approach to cracking punctuality problems is maintained. Ways of achieving this include operating under licence, or with guidance, from the Traffic Commissioners. A further option would be for Local Transport Authorities to be able to trigger a local Traffic Commissioner-led review and implementation of a local punctuality regime.
- How highways are managed is clearly a major factor in bus punctuality but highways are about more than buses and local democracy means that politicians are free to stand for office on policies that could make bus punctuality worse. However national government can bring considerable influence to bear around processes that local government has to follow in making changes to bus priority schemes; in articulating the benefits of policy measures that benefit bus performance; and in taking into account the record of Local Transport Authorities in making future funding decisions.
- Automatic Vehicle Location data provides a wealth of information on how buses are performing and where and why they are not. At present the benefits of AVL are not being well utilised. The DfT should be ensuring the release (not the suppression) of such data and a framework for the format and availability of the data for different audiences (including the Traffic Commissioners, Local Transport Authorities, Passenger Focus and the general public).
- The current arrangements whereby DVSA and the Traffic Commissioners are jointly responsible for the formal bus punctuality regime hasn't worked well for years and clearly isn't working well now. There is a strong case for reform – either through further consolidation of transport safety and regulatory agencies or by giving the bus performance investigative role to an arms' length agency of the Traffic Commissioners.
- Buses are relatively under-funded by Government and on the receiving end of bigger cuts than other forms of transport. The arcane and shoestring operation which is the national bus performance regime is one facet of this under-funding. A bigger share of the transport funding cake for bus should include greater resourcing for measures to improve bus performance and to support a more efficient and effective performance regime.

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