

## Appendix 2

### South Somerset District Council's response to Somerset County Council's consultation on bus subsidy reductions (January 2012)

This response summarises the concerns raised by South Somerset District Councillors, Town and Parish Council representatives at a meeting held at the South Somerset District Council (SSDC) Council offices at Brympton Way on Wed 11<sup>th</sup> January 2012. It also includes other issues raised by both SSDC members and officers arising from further scrutiny of the proposals.

SSDC has major concerns with the proposed bus subsidy reductions. These concerns include:

#### Timescale for implementation

The initial proposal was to introduce these cuts over 2 years, 2012/13 and 2013/14. The latest proposal advocates implementing the whole £1.5m savings in 2012/13. This is too quick. Allowing more time and a phased approach would enable greater opportunity for all parties – The County, District, Town and Parish councils as well as the bus and community transport operators to consider alternatives to “restructure and reshape”<sup>1</sup> and give time for these to be in place prior to withdrawal.

The fact that Parish Precepts have already been set for 2012/13 further constrains any mitigation measures that Parishes may wish to consider. Additionally comments we have received from bus operators indicate that they too have concerns regarding the ‘one-hit’ approach.

#### Taunton Park & Ride

There is concern that the current Taunton Park & Ride costs £500,000 per annum to subsidise a bespoke service when evidence suggests that these journeys do not come anywhere near break even. Other towns and cities operate through utilising journeys in the opposite direction to serve other sites and/or actually serving the Park & Ride site with other direct bus routes to the town centre. Still others look at parking charges in comparison with fares charged to ensure viability. Rather than the current operation of the Park & Ride remaining sacrosanct, SCC should consider ways of increasing the efficiency of this service and using the savings achieved to mitigate the impacts of their proposals for reductions in subsidies on other bus routes.

#### Increasing efficiency on School and Education Contracts

Whilst it is appreciated that the provision of the School Transport Network is a statutory requirement and that government guidance advocates that Further Education Transport is desirable, an assessment should be undertaken to look at increasing the efficiency of the operation of these services i.e. utilising an empty school bus on it's return journey to provide a link for some rural communities or operating some schools with a registered bus service rather than bespoke contracted vehicles. Additionally actually increasing the capacity of some vehicles on education contracts could be cost effective in enabling other passengers (e.g. 6<sup>th</sup> formers) to use these buses on payment of a reasonable fare.

#### Lack of Economic Assessment

There is also concern at SCC's admission that no economic assessment been carried out to indicate the impact these cuts would have on the economy of the area. There is a potential knock on effect for retail and service providers in our towns and rural centres as

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<sup>1</sup> Best Value Statutory Guidance - Department for Communities and Local Government (DCLG) September 2011

well to the operators themselves in terms of depot viability and to their workforces. Impact Assessments need to be undertaken prior to any final decisions on bus subsidy reductions being approved.

Similarly the resulting hidden additional costs of getting services out to people in rural areas will need to be considered. There is every possibility the most significant impact will fall on those least able to afford the alternatives to the bus resulting in increased social exclusion in rural areas. For this reason, whilst impacts on rural areas may not be a 'protected characteristic' for Equalities Impact Assessment this should very much be the case in rural South Somerset.

### **SCC's Methodology in assessing routes**

In Option 3 SCC indicates that they are considering routes on a case-by-case basis and as such this is preferable to the alternatives presented on options 1 & 2, which appear to discriminate against either rural or more 'inter-urban' services respectively. However whilst option 3 may appear preferable no cost benefit analysis has been shown and Town & Parish Councils need to know the specifics in order to assess the impact on their residents.

In response to questions concerning the criteria used to determine where cuts would fall SCC has indicated that they considered the overall budget, costs per passenger, coverage in the area, what needs to be safeguarded and what efficiencies the operators themselves could achieve. Unfortunately no details have been given in relation to this work and complete transparency and availability of this information will be necessary if all key stakeholders are to be able to work together to "restructure and reshape".

### **Level of cuts, measures to mitigate and potential for linking with other types of service delivery**

SSDC is concerned that some routes have been identified for complete withdrawal of funding e.g. services N11, 90, 91, 5 & 8 leaving some communities completely isolated. The N11, 90 and 91 currently operate daily Mondays to Saturdays. Whilst this level of operation is desirable, reducing the number days or times operated could still achieve significant savings. Cost details in respect of subsidies have not been given, although both services 5 & 8 only operate on one day per week and such costs are likely to be extremely low. Should these be included in SCC's list for cuts?

Similarly given that the new South Petherton doctors' surgery at South Petherton Hospital is due to open in July 2012 then the proposal to withdraw funding for service 91 will have a significant impact on a number of settlements.

There is insufficient detail on how the County Council proposes to mitigate the impacts of these proposals and to restructure and reshape as per DCLG guidance where services are or likely to be withdrawn. This work should be done in advance for any final decision (See timescale for implementation above). Part of this mitigation work will presumably be using the money recently announced by the Transport Minister Norman Baker on 8<sup>th</sup> December 2011 to enhance or develop Community Transport and/or Demand Responsive Transport<sup>2</sup>.

SSDC would also like confirmation that SCC will be making a concerted effort to work with District, Town & Parish Councils to look at alternatives and that this effort will take

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<sup>2</sup> "To further support the establishment and development of Community Transport, the Government is making available £10 million to be distributed to 76 local authorities in England, outside London, by formula; this is a repeat of the *Supporting Community Transport Fund* announced in March 2011".

place prior to implementation to ensure that reasonable levels of accessibility are maintained.

### **Demand Responsive Services**

The map for Demand Responsive Services (DRT) shows significant gaps in DRT provision in South Somerset, despite SCC's general approach suggesting the use of DRT to compensate where journeys by conventional bus are being lost. Yet the proposals indicate that all funding will be withdrawn for the N11 and that the other DRT routes will suffer cuts of between 10% and 16%.

It is important that a safety net is in place to ensure that residents in these areas are able to access services. It is noticeable that DRT is provided largely throughout the other districts in Somerset and a comparable level of cover should apply to South Somerset.

### **Other concerns/considerations**

*The consultation makes no mention of other factors affecting local bus provision. These include:*

- SCC's reduction in % of fares reimbursement to the operators from 70% to 55% of average fares
- The Government's 20% reduction in BSOG
- The impact of subsidy withdrawal on current commercially operated routes e.g. First Avon & Somerset's intention to amend both the 54 and the 30 w.e.f. 19/02/12. Does SCC have any indication of likely similar responses from other operators?

SCC refers to seeking contributions towards bus services from new housing and commercial developments. Laudable as this is, it should be recognised that such contributions are very much in the long term (The SSDC Core Strategy is projecting to 2028) and that most development of a significant scale is likely to occur in the more urban areas. The level of such contributions will also be subject to future negotiations and agreements and must be taken in context with a raft of other measures that such new development will be expected to deliver.

Similarly there seems to be reliance on the prediction that "many bus services will continue to be provided by commercial operators". No indication is given as to which routes this is likely to be or the long-term security of these routes if such a decision were to be taken by the operators. SSDC feels that a more realistic assessment would be 'some bus services' rather than 'many'. (Last year only 2 of the Sunday services and no evening services operated in South Somerset were continued following the withdrawal of subsidy by SCC [and one of those remaining routes is currently subsidised by Dorset]).

### **The Actual Consultation**

In terms of how the consultation has been carried out, SSDC has significant concerns with:

- The inappropriate and lack of timing for the consultation i.e. 5 weeks over the Christmas period.
- The difficulties in accessing the website especially when only a short timescale was allowed for responses.
- The quality of questionnaire. In particular the inability to expand sufficiently on issues i.e. Park & Ride
- Inadequate advertising of consultation process.