

# Consultation on changes to bus registration in Scotland



## RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

Midlothian Council

Title **Mr X** **Ms**  **Mrs**  **Miss**  **Dr**  *Please tick as appropriate*

Surname

Vanters

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### 2. Postal Address

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### 3. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Transport Scotland web site)?

Please tick as appropriate  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick **ONE** of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Transport Scotland web site).

Are you content for your **response** to be made available?

Please tick as appropriate  Yes  No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Transport Scotland to contact you again in relation to this consultation exercise?

Please tick as appropriate  Yes  No

## CONSULTATION QUESTIONS

Question 1: do you agree with the proposal to extend the pre-registration notice period from 14 days to 28 days ?

Question 2: Do you agree with the proposal to replace the duty to inform the relevant authorities before making an application for registration with a duty to consult with the relevant authorities?

Yes X No

**Midlothian Council supports these two proposals.**

**The change from a duty to inform to a duty to consult will remove the expectation from many operators that their proposals should be kept confidential within the local authority Travel Team until the formal registration is lodged with the TC.**

**There are potential shortfalls in committing to consultation. Many stakeholder groups do not meet more often than monthly. Some Councils are now running with fewer staff than earlier years. The consultative process will be subject to delay or ineffectiveness as a result if resilience has not been built back in to deal with such matters as this.**

**If the legislation goes ahead without change, we need to address the potential weak links in the process. It may be prudent that the 28 days prior to lodging the registration documents formally with the Traffic Commissioner will be reviewed in the light of actual experience of achieving meaningful consultation with the communities and Council, and the operator.**

**Operators must be required to provide sufficient background information behind their proposals (e.g. patronage figures), in particular if they suggest to withdraw or to reduce the service, so that Local authorities can make informed proposals/decisions in their response. And provision of the full registration documents package is essential at this stage – LAs should not be presented with broad brush strokes of what is to come, at this stage the LAs need to have full details – times, routes, maps etc.**

Question 3: Do you agree that relevant authorities should be encouraged through guidance to draw potential concerns about new registrations to the attention of the traffic Commissioner for Scotland and/or Transport Scotland?

Yes X No

**Midlothian Council supports this. It will highlight potential issues for the Traffic Commissioner. This 'encouragement' should equally apply to all registration variations as there may be issues with old registrations as well as new ones.**

**Midlothian Council urges that bus route numbers should be of concern to the Traffic Commissioner. Numbers should be chosen to avoid duplication along common corridors. This should reduce the risk of bus-users ending up on the wrong bus (although with the 'correct' service number).**

**Many new technologies for Real Time Information display would be simpler if there was a reliable method of eliminating situations where a single route number is used for two or more different services in the same corridor or area.**

**These situations could be eradicated at the registration stage with input from Local Authorities and/or Regional Partnerships. The Traffic Commissioner should be given powers to reject a chosen service number.**

**A recent survey within SEStran however suggested that the problem was not as bad as previously thought. In Midlothian, work has been going on to resolve the worst number clashes. It would be easier to maintain integrity of the route-numbering system if Traffic Commissioner involvement was included in this legislation.**

**Question 4a: Do you agree with the proposal to reduce the period of registration from 56 days to 42 days? What difficulties (if any) do you consider such a change might present and how might these be addressed?**

Yes No X

**Midlothian Council does not support the reduction of this period from 56 to 42 days. It is crucial that there is sufficient time for operators and LAs to provide information about timetable changes or new opportunities. 56 days is occasionally insufficient at the moment to translate the timetables into leaflets/online data/RTI. We believe that if this change is allowed to go ahead, then this will be to the detriment of the travelling public who would be even less likely to be fully aware of forthcoming changes.**

Question 4b: An alternative option would be to reduce the registration period from 56 days to 42 days only where Electronic Bus Service Registration (EBSR) is used. Do you agree with this?

Yes  No

**Midlothian Council does not support this proposal. We would like to see the eventual universal use of EBSR. However, the current format of EBSR does not engender total confidence. EBSR generated documents regularly require additional input, often by LAs trying to make sense of the submissions when preparing data output to Traveline etc. Route maps are often difficult to interpret, and road by road route description [as required in Scottish legislation] has not been made a requirement of the EBSR software which was designed with reference to English legislation. If and when EBSR can be adjusted to tackle these and other discrepancies, then the EBSR process may develop to allow a more automatic pathway to Traveline data generation – and maybe the period could be reviewed.**

Question 5: Do you agree that we should require operators to detail within registered hourly frequency bands any services that are registered as frequent services?

Yes  No

**Today operators tend to provide their detailed exact schedule for real time information, vehicle/driver duties, and another abridged schedule for the registration sent to the Traffic Commissioner. Duplication of effort is surely unnecessary.**

**Some have expressed concern that this measure would prevent bus operators responding to sudden increases in demand at busy periods. Vehicle duplication on a high intensity service should suffice to work around this problem.**

Question 6: Do you agree that if the proposed changes set out above are adopted, they will improve the bus registration process in Scotland ?

Yes  No

Yes, with the exception of Q 4a and Q 4b.

**Question 7: It is possible that much of what is proposed above could be achieved through Guidance and/or a Code of Conduct to facilitate engagement between operators and relevant authorities rather than changes to the legislation. Do you have any views on this?**

Yes  No

**In a perfect world this would undoubtedly be the case. Unfortunately, we do not live in a perfect world, so to ensure the public receives the best service from operators and local authorities alike, we are of the opinion that the measures above should be included in revised legislation.**