

Our Ref: JC/18/35

Your Ref: 7175LBK

Date: 24 October 2014

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Andrew Stevenson
Bus and Local Transport Policy
Transport Scotland
Area 2-D North
Victoria Quay
EDINBURGH
EH6 6QQ

Dear Andrew

Consultation on Bus Service Registration

Inverclyde Council would wish to thank Transport Scotland for the opportunity to respond to this consultation. Our response is attached.

As we state in response to Question 1, Inverclyde Council is within the Strathclyde PTA area and as such bus registration documents are sent by bus operators to SPT in order to comply with the duty to inform the relevant transport authority. We have had sight of SPT's response to this consultation, with which we agree, and have added additional comments where relevant.

The Council and SPT are supportive of the majority of proposals in the consultation document which when enacted should improve the bus service network for the travelling public.

Yours sincerely

Ian Moffat
Head of Environmental & Commercial Resources

Enc Inverclyde response to bus service registration consultation

Enquiries to: Robert Graham, Environmental Services Manager, 71 East Hamilton St, Greenock, PA15 2UA
Tel: 01475 714827

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

Inverclyde Council

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

Surname

Graham

Forename

Robert

2. Postal Address

Environmental Services Manager		
71 East Hamilton Street		
Greenock		
Postcode PA15 2UA	Phone 01475 714827	Email:robert.graham@inverclyde.gov.uk

3. Permissions - I am responding as...

Individual <input type="checkbox"/>		/		Group/Organisation <input checked="" type="checkbox"/>	
<i>Please tick as appropriate</i>					
(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)? <i>Please tick as appropriate</i> <input type="checkbox"/> Yes <input type="checkbox"/> No			(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? <i>Please tick as appropriate</i> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis <i>Please tick ONE of the following boxes</i>					
Yes, make my response, name and address all available <input type="checkbox"/>					
<i>Or</i>					
Yes, make my response available, but not my name and address <input type="checkbox"/>					
<i>Or</i>					
Yes, make my response and name available, but not my address <input type="checkbox"/>					
(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? <i>Please tick as appropriate</i> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					

CONSULTATION QUESTIONS

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

Yes No

As you will be aware, applications for registrations of bus services in the Inverclyde Council area and across neighbouring council areas are within the Strathclyde Public Transport Authority (PTA) area and are submitted to SPT. SPT forward copies to the appropriate constituent local authorities.

The Council supports SPT's view that a statutory two-way dialogue in the period before a registration is submitted will enable the PTA to advise the operator of the likely result of the proposed service changes and ensure that a more co-ordinated approach to network planning and development is in place, which is to the significant benefit of passengers and communities.

Extending the notice period will also allow more time for representations to be made by the Council and our PTA representative to SPT especially regarding route cancellations. It will also give SPT more time to arrange for alternative bus services to be put in place.

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 No

Inverclyde Council supports this proposal. In conjunction with the extended notice period set out above, this proposal in our view, will encourage a more collaborative approach between bus operators and the relevant authorities.

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 No

Comments

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

Inverclyde Council agrees with this proposal in order to maintain the overall time taken for the whole process from initial notification to the start of the service at 70 days.

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

Inverclyde Council's view is that to avoid confusion the time period for bus service registration for both methods should be reduced to 42 days. We also agree with SPT that this measure will incentivise operators to move speedily to EBSR.

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

Inverclyde Council supports this proposal which would require frequencies for 'frequent services' to be more precisely detailed in service registrations. This would prevent the incumbent operator simply increasing the frequency of buses in response to a competitor's entrance to the market without first having to make an application to the Traffic Commissioner. In theory, this should assist new entrants to the market.

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

Inverclyde Council supports the majority of the proposals outlined in the consultation document.

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

Whilst guidance is welcome, for change to be effective it must be underpinned in our view by statute.