

# 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

SEStran

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

Surname

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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	<input type="checkbox"/>
or	
Yes, make my response available, but not my name and address	<input type="checkbox"/>
or	
Yes, make my response and name available, but not my address	<input type="checkbox"/>

**(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

**SEStran strongly supports these two proposal which will provide greater opportunities to arrive at integrated services that caters for public needs**

**The change from a duty to inform to a duty to consult should also take away the 'demand' by some operators that their proposal should be kept confidential until the format registration is lodged with the TC.**

**We would also expect that operators would 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 as relevant in their response.**

**It would also be helpful if 'guidelines' as to how the consultation period should be used; e.g.**

**Weeks 1 and 2:- Information provision and time for Council officials to fully understand the implications of the proposals + Meetings / negotiations between Operator and Council Officials**

**Weeks 2, 3 and 4:- Operator and Councils to act as necessary (amend registrations, instigate tendering /procurement of replacement services as relevant, amend other services in the network 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

**SEStran strongly supports this. It will quickly bring potential issues to the attention of the Traffic Commissioner and should, in the longer run, avoid further changes to the network due to issues that could have been resolved**

**at the initial stage. It should also be of assistance to the Traffic Commissioner in the undertaking of her work**

**We would however argue that this ‘encouragement’ should also apply to any registration changes and not only to new registrations.**

**Linked to this issue, SEStran would like attention paid to what Service numbers are chosen for new (or significantly changed) services. Conflicting service numbers in the same corridor and at the same (or neighbouring) bus stops should be avoided. This should reduce the risk of bus-users (that are unfamiliar with the area and the local network) mistakenly boarding the wrong service. This has been highlighted as a problem in the City Centre of Edinburgh where, allegedly, tourists that are unfamiliar with the network (and perhaps also deregulation) have ended up on the wrong bus (although with the ‘correct’ service number).**

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

**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

**SEStran sees good arguments both for and against. On balance, we would perhaps suggest there should be no increase in the current overall timescale of 70 days but, importantly, there must be sufficient time to allow for adequate provision of information so that the public will be fully aware of the changes and can make alternative arrangements if necessary.**

**Could we consider a shorter registration period if the application is deemed as positive for the travelling public (as viewed by the LTA)?**

**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

**SEStran would in general support measures that would encourage the use of ESR. However, the current format of ESR is not 'perfect' and still regularly requires additional input, often by Local Authorities.**

**We are also concerned that that this proposal will, arguably, favour the bigger operators and discriminate against the smaller ones – so, on balance, we would perhaps not be in favour of this proposal.**

**In any case, should the 'total' period remain at 70 days, this proposal will not be an issue.**

**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

**This measure could reduce predatory behaviour by some operators against new entrants to the area – although, arguably, this would have been more of a relevant issue 20 or so years ago. It could also be argued that 'set' departures for very frequent services would make for more accurate information provision – but is it necessary to know the exact departure time for such high frequency services?**

**In any case, operators tend to provide their 'exact' schedule as far as real time and paper based information is concerned for high frequency services.**

**We are concerned that the suggested measure could prevent operators responding to sudden increases in demand at busy periods (e.g. the Edinburgh Festival). We would suggest this is of greater importance to the general public, so, on balance, SEStran do not agree with the proposal.**

**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

No further comment

**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, as relevant, should be included in the regulations.**