

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

Chartered Institute of Logistics and Transport

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

Surname

Derek

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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 ?

Yes No

Current good practice in the industry is to offer as much notice as possible as part of day to day joint working between transport authorities and bus operators. Anything that will support better co-operation will be helpful so we can see advantages in the 28 day discussion period. To avoid any chance of the 28 day period delaying prompt dialogue about changes from the current 14 days there should be a requirement for any concerns to be raised promptly within the current 14 day period to allow joint planning of better options for change.

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

Better partnership working between transport authorities and bus operators delivers benefits for both sides and CILT promotes such partnership working as the best way to deliver better bus services.

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

Joint working between all parts of the transport industry are important. National plans and oversight by the Traffic Commissioner should be fully implemented within local bus partnerships between each local authority/transport authority and the local bus operators. Bus quality partnerships should be used to govern the circumstances when a local authority would draw issues to the attention of the Traffic Commissioner and Transport Scotland.

Experience shows that it is only through bus quality partnerships that bus operators can gain clear commitments from local authorities and their partners such as Transport Scotland and the Traffic Commissioner about what they can expect from the road network, and that bus operators can be enabled to meet the social needs in the local area.

In the event that there is no bus quality partnership between a bus operator and the local authority/transport authority then there would be a case for bringing this breach of good practice to the attention of the national authorities. However dealing with strategic issues

like this as part of individual registrations would not be appropriate as it would be inefficient and probably ultimately ineffective.

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

A registration period of 42 days would not be achievable without other changes in the registration process. Not all parties could currently commit to change timetables and information within 42 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

If EBSR is used then our concerns about changing timetables as shown in Q4a would not apply so the timescale could be reduced. However successful use of EBSR on this schedule would depend on improvements being made to the system. It is not as user friendly as it needs to be to meet the needs of all types of bus operator in Scotland. In particular the maps to be clearer, the explanation of the codes needs to be more user friendly and there needs to be more scope to describe details such as stopping arrangements without specialist knowledge in the system being needed.

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 proposal appears to be attempting to use a statutory process to deal with something that would be better dealt with through a voluntary partnership agreement. If local authorities and bus operators have failed to enter into partnership agreements relating to frequent bus services then there would be a case for additional detail about frequent services. Therefore although we do not support this very detailed requirement we would support a stronger push towards voluntary partnership agreements to ensure that social and commercial needs are met within all local bus provision.

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

It is not clear to CILT that there is a problem with the registration process of sufficient magnitude to merit these changes. If it is not broken then there is no real need to fix it.

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

We would strongly support dealing with these issues through a Code of Conduct Approach. Legislation is good at dealing with failure but a Code of Conduct would be better at driving improvement. As noted above most changes in the bus industry should be managed through partnership agreements between bus operators and local authorities/transport authorities. All of the parts of the UK with the best bus services have excellent partnership working between the public agencies and the operators.

Partnership approaches ensure that diversity of needs across Scotland are recognised. Provided these partnerships define clear commitments for all parties they provide an excellent contractual framework within which to deliver better bus services. Buses run on roads so clear commitments are needed from roads authorities and they serve social and economic needs so operators need to make clear commitment about how they are serving these needs.