

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

Society of Chief Officers of Transportation in Scotland (SCOTS)

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

Surname

Wallace

Forename

Ewan

2. Postal Address

Chair of SCOTS

c/o Tactran

31 Kinnoull Street

Perth

Postcode PH1 5EN

Phone 01738 475771

Email info@tactran.gov.uk

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

(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

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

Comments

SCOTS supports this proposal. The proposal to extend the pre-registration period from 14 to 28 days would create useful time for dialogue between transport authorities and operators.

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

Comments

Whilst there are mixed views on this within SCOTS authorities, the majority view is that replacing the duty to 'inform' to 'consult' will place that dialogue on a more consistent, agreement and outcome-focused footing. SCOTS believes that guidance will be needed on the nature, scope, detail and process of such consultation, as distinct from the current notification process, including in relation to respective operator and transport authority obligations and responsibilities and in relation to the consultation process and provision of information by operators and 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

There are mixed views on this within SCOTS authorities. The majority view is that this should create a helpful opportunity for transport authorities to highlight with the Traffic Commissioner any specific concerns about not only new registrations, but also in relation to varied or withdrawn services, particularly where the implications of proposed changes are not in the public interest. Guidance will be required on the types of concerns that would be covered and the procedures and timescales for addressing these. It is envisaged that the majority of any such concerns would be matters for highlighting with the Traffic Commissioner (e.g. in terms of potential non-compliance with the proposed registration process) but there may also be concerns of a policy or a strategic nature (e.g. disruption to integration with other modes etc.) which it would be appropriate to raise with Transport Scotland.

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

SCOTS authorities have mixed views on this proposal. See individual Council and Regional Transport Partnership responses.

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

SCOTS does not support the introduction of variable registration periods for manually and electronically submitted registrations believing that the proposals, if enacted, should apply consistently to all registrations. SCOTS would, however, support the principle of making EBSR mandatory by a specific date.

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

SCOTS supports this proposal.

This would allow for an easier route to market for new operators, whilst also providing transport authority benefits (in terms of planning, provision and management of on-street bus stops and other infrastructure) and also passenger benefits (in terms of provision of more detailed/accurate travel information, including provision of improved real time information)

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

SCOTS believes that those changes which are supported in the above responses have the potential to improve the registration process and foster improved dialogue and partnership between operators and transport authorities, with the added potential to deliver significant benefits for communities and the travelling public across Scotland. These proposals should form part of a wider programme of review aimed at enhancing the role of the bus and other matters such as issues with the currently cumbersome procurement process for securing supported bus services, including review of the effectiveness of current “de-minimis” arrangements, should be addressed.

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

SCOTS authorities have mixed views on this proposal. See individual Council and Regional Transport Partnership responses.