

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

Glasgow City Council Labour Group

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

Surname

Adams

Forename

James

2. Postal Address

Glasgow City Council

City Chambers

Glasgow

Postcode G21DU

Phone

Email

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

Yes, the Glasgow Labour Group strongly supports this proposal and believes that this will allow local authorities and regional transport partners to work more effectively with providers.

A longer pre-registration period will allow Public Transport Authorities to have a more productive and considered input into any decision, notify service providers of the likely consequences of any changes and correct any errors or technical faults within the submission.

The Glasgow Labour Group is committed to increasing dialogue between PTAs and operators in order to better serve Glasgow's communities and believe this will save the PTA and operators' time, resources and improve services for users

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

Yes, the Labour Group strongly supports this proposal and believes there to be significant benefits to passengers from a more formal and legislated process of notification including extending the duty to include relevant Community Councils.

Glasgow Labour's 2012 Manifesto contained a commitment to campaign for the re-regulation of Scotland's buses in order to better represent local people. It is our belief that this proposal will provide PTAs and local authorities with a better mechanism to express community concerns and ensure a more efficient and co-ordinated approach to the planning and development of services. We believe this has the potential to benefit passengers and local communities.

However, the Labour Group believes any duty to consult must have its terms properly defined, measured and enforced.

Passengers will be poorly served if 'to consult' is allowed to be synonymous with 'to inform'; and if operators are able to pick and choose who they believe to be 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

Yes, the Labour Group strongly supports this proposal. We believe a stronger and statutory mechanism for registering concerns to be an important step in ensuring that operators are fully compliant with the revised registration process.

We believe this will help ensure that operators engage in meaningful consultation with PTAs and take the registration period seriously, acting as a further check on the true purpose of registered services.

It is the view of the Glasgow Labour Group that the process should be robust and PTAs should be expected to raise their concerns including those from passengers and local communities regarding any service seeking registration, or who have already registered, to ensure that passengers are best served.

The Glasgow Labour Group also believe that In addition to this, it would be appropriate for the Traffic Commissioner to have increased power and scope when considering the impact that a potential registration will have on the public interest.

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

Yes, the Labour Group supports this proposal.

We acknowledge that this may create increased pressure on PTAs but believe that the public interest and finances are best served by a streamlined process and that any challenges could be overcome.

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

The Labour Group does not believe that this is the best option and believes that more is to be gained from a reduction in the registration period for all applications with other efforts being made to ensure that a maximum number of applications are completed electronically. We believe that it would be beneficial for there to be a mandatory time frame for all operators to move towards 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

Yes. This would facilitate entrance to a route for new bus operators where there is an incumbent operator. It would also be a preventative measure against operators running predatory services to poach passengers from rival providers.

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

The Glasgow Labour Group is committed to campaigning for the re-regulation of bus services in Scotland. We believe that this would provide better quality of bus services for the people of Scotland. Whilst these proposals do not extend towards re-regulation, it is clear that they are a positive development from the status quo and have the potential to improve services for the travelling public.

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

The Glasgow Labour Group does not support this view.

The existing parameters binding bus operators do not sufficiently ensure the protection of socially necessary services. Nor do they demand sufficient attention be given to the needs of communities reliant on less profitable routes when cuts to services are being considered. There is a pressing need to establish a clear, enforceable benchmark against which the behaviour of bus operators can be measured and a minimum standard of service can be enshrined. A voluntary code of conduct falls well short of having the necessary powers to do this.