



**Community  
Transport  
Association**

## **Response to the Department for Transport**

### **Consultation on the Definition of eligible services for the statutory bus concession in England**

Closing Date: 23 January 2009

The Community Transport Association

The CTA is a rapidly growing national charity giving voice and providing leadership, learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for third sector passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is part-funded by the Department for Transport, the Welsh Assembly Government and the Department for Regional Development (Northern Ireland).

## **CTA's Response to Consultation**

The CTA welcomes the opportunity to contribute to Department for Transport's consultation process. After reading through the consultation we have decided to respond on those specific areas that we believe would have a marked effect on our sector.

## **Contact Details**

Any queries regarding this response should be directed to:

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**CONSULTATION RESPONSE FORM****CONSULTATION ON CLARIFYING THE DEFINITION OF WHICH SERVICES ARE ELIGIBLE FOR THE STATUTORY BUS CONCESSION IN ENGLAND****PART 1 - Information about you**

Name	Brian Shawdale
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Postcode	SK14 2NY
email	brian@ctauk.org
Company Name or Organisation (if applicable)	Community Transport Association UK
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>CTA UK has 1400 member organisations, We placed a draft of this consultation response on our web site and informed all members that it was there for comment.</p>	

If you would like your response or personal details to be treated **confidentially** please explain why:

N/A

**PART 2 - Your Comments**

<b>1. Do you agree that services on which the majority of seats can be reserved in advance of travel should be made ineligible for the statutory concession?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

The CTA supports the Department of Transport's intention to remove entitlement to concessionary fares on locally registered sections of long distance coach journeys. However the wording that has been chosen – "the majority of seats can be reserved in advance of travel" – will have the affect of including ct services which currently enjoy discretionary entitlement provided by their local authority. There is the need for a revised definition which should also make clear that Section 22 services are still included in the concessionary fare scheme.

Although not the detailed purpose of this consultation, the CTA would remind the Department of Transport that Section 19 services, especially when they are run for people who find mainstream public transport difficult to access due to disability, rurality, religious or cultural reasons should be eligible for concessionary fares on a statutory basis.

<b>2. Do you agree that Services that do not run at least once per week for a period of at least 6 consecutive weeks should be made ineligible for the statutory concession?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

CTA believe that it should be the travelling needs of the Concessionary Pass holder's which determines the availability of concessionary fares, not the frequency (or otherwise) of the service.

<b>3. Do you agree that services operated primarily for their historical interest or for tourism should be explicitly excluded from the statutory concession?</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

We are not aware of any ct operators providing this type of service.

4. Do you agree that rail replacement services should be explicitly excluded from the statutory concession?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make:  No further comment		

5. Do you agree that services where the fare charged by the operator has a special amenity element should be explicitly excluded from the statutory concession?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make:  No further comment		

6. Do you have any further comments about the proposals or the existing eligibility criteria?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make:  In addition to the point made above, we would register our disappointment that the scope of this consultation has been so narrow and that, overall, the range of eligible services/operators is too limited. There are still significant problems for concessionary travellers caused by the lack of service/operator types which should, in our view, should be reimbursed mandatorily for providing concessionary travel. The CTA believes that every member of the public is entitled to equality of access and that concessionary travel is an increasingly important mechanism that can be used in the pursuit of this aim. It is imperative that concessionary travel schemes do not discriminate against any of the intended beneficiaries, and the CTA believes that central government policy should explicitly reflect this. Concessionary travel scheme administrators must ensure that such a policy is implemented effectively and that every eligible passenger has access to the same level of service. The CTA believes, therefore, that the following over-arching strategic aim should be adopted by government:  <b><i>Any person unable to make use of their concession on existing eligible transport services as a result of disability, age or other limiting factor should be permitted to use it on other transport services, with the operators of those services being reimbursed by the administrators of the local concessionary travel scheme. All eligible passengers should receive equal access to services. However, the provision of this fair level of service to currently excluded individuals must not</i></b>		

***adversely affect the level or quality of service enjoyed by existing passengers. This service provision should be adequately resourced by central government, whether the UK government or, if different, the appropriate level of government for Scotland, Wales and Northern Ireland.***

Furthermore, the following specific objectives should be adopted as part of the drive to meet the above aim:

***All public and community transport services should be entitled to reimbursement of the concessions they offer to passengers. Such provision should apply whether the service in question is available to the general public as a whole (as with scheduled commercial or section 22 services) or available to a specific sector of the public (as with section 19 Dial-a-Ride services in Great Britain or section 10B permit services in Northern Ireland). Administrators of concessionary travel schemes, usually local authorities, have discretionary powers to reimburse operators of certain other types of service. The number and type of services automatically entitled to reimbursement should be widened to include all services that offer safe, legal transport and the discretion to discriminate should be removed. Concessionary travel scheme operators should be required to demonstrate that schemes are focused on user requirements and not on the administrative requirements of the scheme administrators. Given that community transport services are non-commercial and already frequently operate at capacity, they are not in a position to benefit from the anticipated increase in passengers that improved concessionary fares will bring to commercial operators. The concessions allowed to passengers travelling with non-commercial operators should therefore be reimbursed in full. As well as including the widest possible range of transport service providers in concessionary schemes, the cost of training some people (eg travellers with a learning disability) to use their concessionary entitlement should be covered by the scheme itself. Increased flexibility of access to travel concessions should be permitted in order to allow groups of people to travel together on services that can offer such provision, if that provision can be achieved more efficiently than transporting the passengers individually.***

Government should review the impact of changes to concessionary travel policy and delivery mechanisms in order to assess whether the above objectives are being met, to ensure that neither passengers nor operators are worse off as a result and to review the overall cost of implementation. This should be a UK-wide exercise which compares and contrasts the approaches taken in England, Scotland, Wales and Northern Ireland and their impacts.

If you have any other general comment that you would like to make concerning this consultation, please give them here:

The CTA's detailed policy position on concessionary travel is set out in more detail at <http://www.ctauk.org/index.aspx?id=758>.