

ANNEX C

CONSULTATION ON EXTENDING LOCAL BUS REGISTRATION AND BUS SERVICE OPERATORS GRANT (BSOG) TO DEMAND RESPONSIVE TRANSPORT (DRT)

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

Community Transport Association

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

Surname

MacDonald

Forename

John

2. Postal Address

54 Manor Place

Edinburgh

Postcode EH6 6ST

Phone 0131 220 0052

Email john@ctauk.org

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 Scottish Government 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 Scottish Government 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 Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

EXTENDING LOCAL BUS REGISTRATION AND BUS SERVICE OPERATORS GRANT (BSOG) TO DEMAND RESPONSIVE TRANSPORT (DRT) - CONSULTATION ON DRAFT LEGISLATION

Pro-forma for use when responding on draft guidance:-

Name of respondent	John MacDonald
Organisation (if applicable)	Community Transport Association
Interest (eg trade; local authority; passenger interest)	Representative body for voluntary and community transport providers
Q1. Do you agree with the definition of a flexible service as described in the draft legislation, or do we need to add further details?	In the context of flexible services specifically <i>for the general public</i> the definition in the draft legislation is appropriate. However there are many Section 19 services, operated by voluntary and community groups, for certain categories of people who are deemed to be socially excluded, which are also flexible but the permit prevents them from carrying the <i>general public</i> . This definition would not apply to these services. Section 19 services are currently the most common type of service from voluntary sector transport providers and thus unless there is a trend towards Section 22 and away from Section 19 the proposals will make only a limited difference to voluntary and community transport provision of DRT services.
Q2. Do you agree that DRT services be allowed to be registered as a local bus?	Yes, we agree with this. Allowing DRT services to be registered as a local bus affords the opportunity to design local transport which fits the needs of local communities better.
Q3. Do you agree with the proposed conditions for registering DRT services?	We have concerns about the extent of the detail required in the records of operation of flexible services but note that these apply "Where so required by the Traffic Commissioner...". For community transport providers this would be an onerous condition if it was typically required and would potentially act as a deterrent for community groups' involvement in DRT services for the general public. However if it is intended that this measure is used only in exceptional

	<p>circumstances where there is good reason for the Traffic Commissioner to require this level of detail, then we would agree with the proposed conditions.</p> <p>Consideration could be given to changing the requirement that all seats should be made available for the general public to specifying that a proportion should be made available. This would allow the service provider to give priority to certain dedicated services, such as regular attendees at day care centres.</p>
<p>Q4. Should DRT services receive BSOG payments?</p>	<p>Yes. From a voluntary and community transport perspective the inability to claim BSOG on flexible parts of Section 22 services is a hindrance. This measure eliminates this obstacle to designing flexible routes and so is welcome.</p> <p>Section 19 DRT services are already eligible for BSOG and there should be no change to this.</p>
<p>Q5. Do you agree with the proposed conditions for DRT services to receive BSOG payments?</p>	<p>Yes, though we are not clear as to what situations would be deemed to be a deterrent for the general public regarding the advance booking arrangements of a registered DRT route. DRT is uncommon and so the general public may have raised and unrealistic expectations of this approach to transport provision, adopting the view that they can access a service which can respond very quickly to their needs (akin to a taxi service). Most DRT services will require bookings to be made at least one day in advance. At what point does advance booking become a deterrent for the general public? If DRT were to grow the general public would have to get used to planning journeys in a way that most are not currently used to.</p>
<p>Q6. Do you think the passenger will benefit from these proposed changes?</p>	<p>Yes. Transport should ideally respond to the needs of the passenger, not the other way round where the passenger has to fit in with the requirements of the service operator. In rural areas in particular buses sometimes travel with few or no passengers because the schedule does not meet the needs of people and communities. DRT means that services only run when there are certain to be passengers and the routes are designed to suit them. If DRT works well then this should</p>

	be of great benefit to passengers.
<p>Q7. Is there any general comments about these proposals you would wish to make?</p>	<p>From a voluntary and community transport perspective these proposals will only apply to services which operate under a Section 22 permit. Currently we think there are 30-40 Section 22 permit holders in Scotland. The vast majority of community transport providers operate under Section 19 permits and therefore at this point in time the proposals will impact upon a relatively small number of services. However, the proposals do overcome one of the hindrances to Section 22 services. If Section 22 services continue to grow then these proposals will be of benefit.</p> <p>One further improvement which we would ask the Scottish Government to consider is to reduce or even withdraw the minimum number of seats required on a vehicle in order for a Section 22 permit to be issued; this is currently 9. In some places, particularly remote rural areas, smaller vehicles such as 7 seater MPVs would be more viable for local transport. The capital costs of vehicles would be substantially lower and vehicles would be more likely to operate at full capacity. This further flexibility would offer a practical, cost-effective approach to improving local transport.</p>