



Office of the  
**Traffic Commissioner**

# Summary of responses to the proposed Statutory Guidance document on local bus services consultation

February 2014

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## Consultation purpose

On 21 August 2013, the Senior Traffic Commissioner for Great Britain issued a 12 week public consultation seeking views on the introduction of a Statutory Document on Local Bus Services.

The draft document set out what traffic commissioners should expect from operators who run registered bus routes and proposed revisions to the standards for reliable and punctual services. The Senior Traffic Commissioner also made reference to the responsibilities on local authorities, local bus partnerships and the expectations on the Driver and Vehicle Standards Agency (incorporating VOSA and the DSA). In addition, the consultation proposed revisions to financial penalty levels where operators fail, without a reasonable excuse, to operate a local bus service, or do not run a registered service according to the timetable.

The document will replace the current Practice Direction on Local Bus Services.

The consultation was published on the traffic commissioner corporate pages of GOV.UK and a copy of the consultation can be viewed and downloaded at: <https://www.gov.uk/government/consultations/revised-statutory-guidance-on-local-bus-services>

The closing date for the consultation was 13 November 2013.

# Responses received

The Senior Traffic Commissioner received responses from:

1. Arriva UK Bus
2. Association for Road Traffic and Safety Management
3. Association of Local Bus Company Managers (ALBUM)
4. Association of Transport Co-Ordinating Officers (ATCO)
5. Association of Transport Co-Ordinating Officers (Scotland)
6. Bath Bus Company Ltd – RATP group
7. Bolton Council
8. Bus Users Cymru
9. Campaign for Better Transport
10. Cardiff City Transport Services Ltd
11. Chartered Institute of Logistics and Transport (CILT)
12. Chris Heaps - Individual
13. City of York Council
14. Colchester Bus Users Group
15. Confederation of Passenger Transport (CPT)
16. Connect Tees Valley
17. Dengie Hundred Bus Users' Group
18. Department for Transport Street Works
19. Derbyshire County Council
20. Devon County Council
21. Driver and Vehicle Standards Agency (incorporating VOSA and the DSA)
22. Environment Agency
23. Essex County Council
24. EYMS Group Ltd
25. FirstGroup plc UK Bus Division
26. Gateshead Council
27. Gloucestershire County Council
28. Go South Coast
29. Greater Manchester Bus Operators' Association Ltd
30. Hampshire County Council
31. Joint Authorities Group (UK) (JAG(UK))
32. Leicester City Council
33. Lincolnshire County Council
34. Local Government Association Public Transport Consortium
35. Lothian Buses
36. National Joint Utilities Group (NJUG)
37. Neil Pennington - individual
38. Norfolk County Council
39. Norfolk Green
40. North East of Scotland Transport Partnership (Nestrans)
41. Nottinghamshire County Council
42. Oxfordshire County Council
43. Passenger Focus
44. Passenger Transport Executive Group

45. Plymouth Citybus Ltd
46. Public Transport Users Committee for Wales
47. Raymond Wilkes - individual
48. Reading Borough Council
49. Real Time Information Group (RTIG)
50. Richard Delahoy - individual
51. Robert Griffiths – individual
52. Rolling Solutions trading as D & G Bus / Green Triangle Buses Ltd trading as South Lancs Travel
53. Scottish Environment Protection Agency
54. Scottish Road Works Commissioner
55. Severn Trent Water Ltd
56. South East Scotland Transport Partnership (SEStran)
57. Staffordshire County Council
58. Stagecoach Group
59. Stephensons of Essex Ltd
60. Strathclyde Partnership for Transport (SPT)
61. Thurrock Council
62. Transport for Greater Manchester
63. Traveline Cymru
64. Travelwatch East Midlands
65. Travelwatch North West
66. Unite the Union
67. Upper Tribunal Administrative Appeals Chamber
68. Welsh Government
69. Welsh Highway Authority and Utility Committee
70. West Midlands Travel Ltd
71. West of England Partnership
72. West Yorkshire Campaign for Better Transport Bus Group
73. Western Power Distribution
74. Wigan Council on behalf of Greater Manchester Traffic Managers
75. Wirral Council

# Analysis of responses

The majority of respondents provided comments on the consultation. A small number provided a NIL response.

The largest amount of responses came from local authorities, accounting for 25% of respondents.

Two other groups registered over 10% of responses – operators (18%) and trade associations (14%).

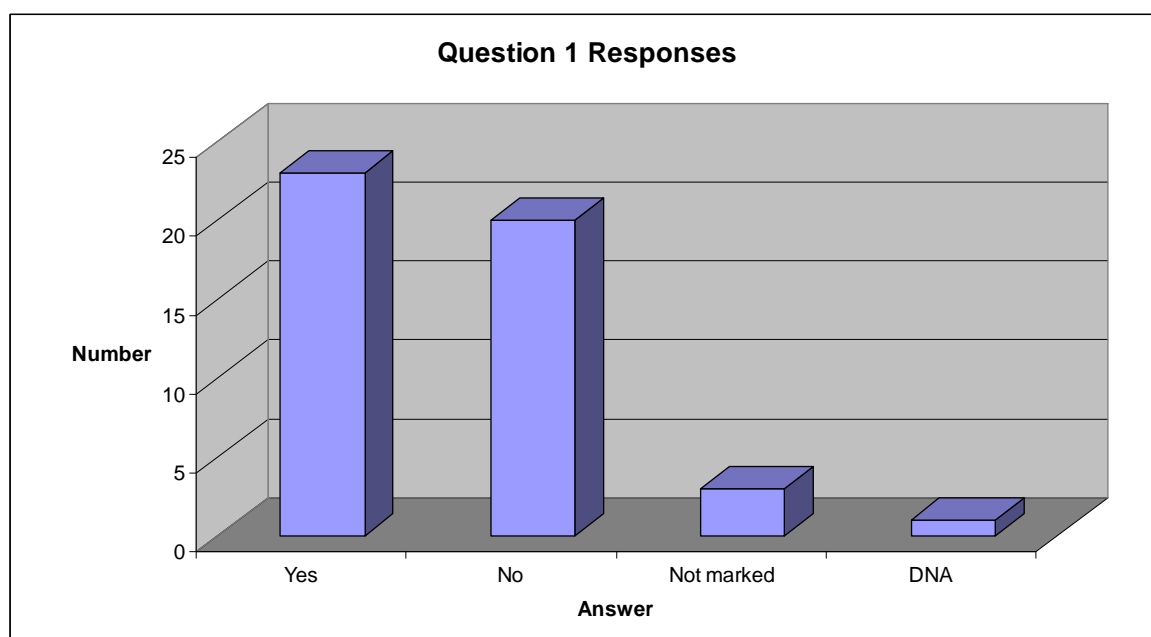
65% of respondents used the consultation form to submit their responses, answering some or all of the questions listed on the document.

In response to individual questions on the consultation forms, some respondents either did not answer a question or did not mark the question with a ‘yes’ or ‘no’ response. For the purposes of this summary, the latter has been categorised as “not marked”. No attempt has been made to assign a response in view of the level of detail in the comments submitted.

The following analysis reports on the 47 respondents who used the consultation form.

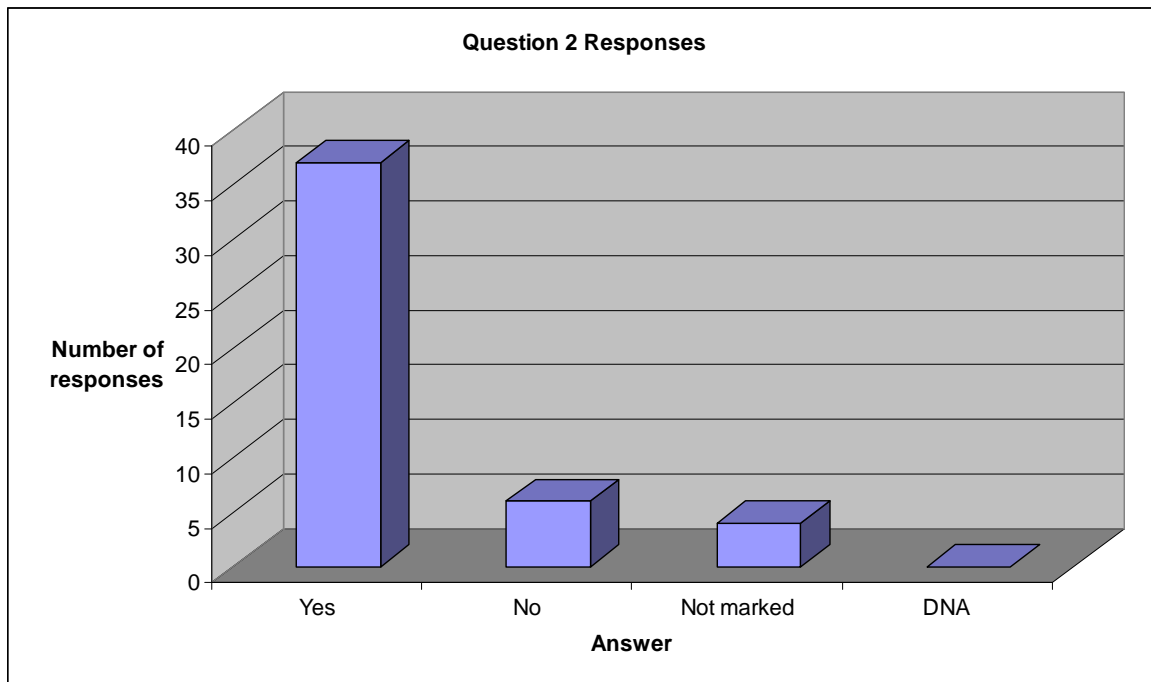
## **Question 1: Does the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?**

23 respondents (45%) said that the guidance and directions provided sufficient clear details to inform industry and other stakeholders. 20 (43%) respondents noted the document did not achieve that clarity. In three instances, the boxes were not marked, while one respondent did not answer this question.



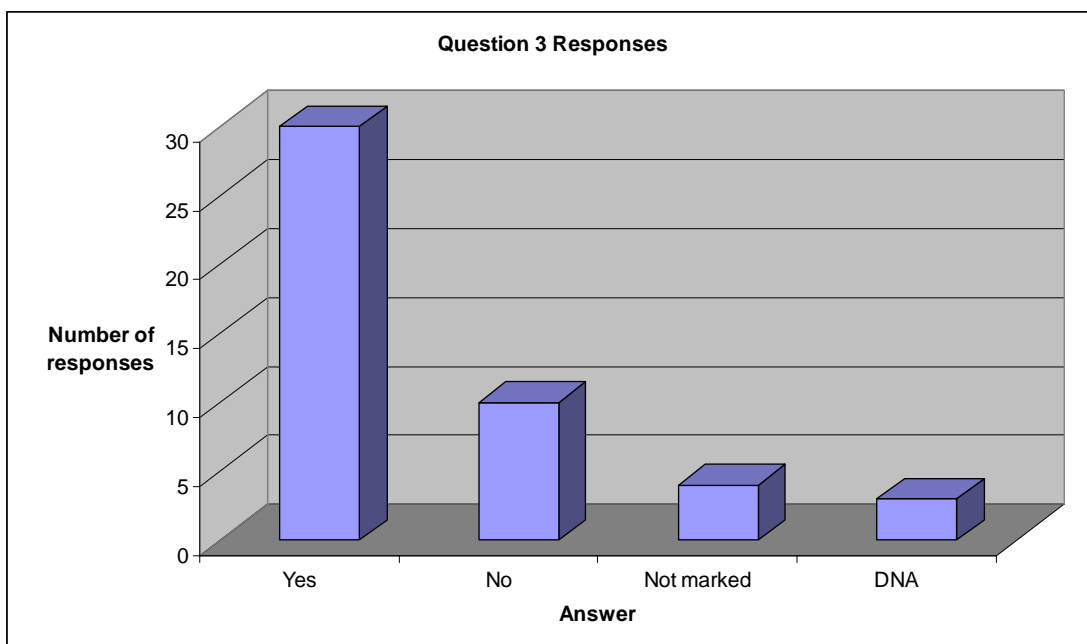
**Question 2: Do any parts of the guidance and/or directions require clarification? If so, please explain why.**

37 (79%) respondents felt the document did require clarification. Six (12%) answered no to this question. In four instances, the boxes were not marked.



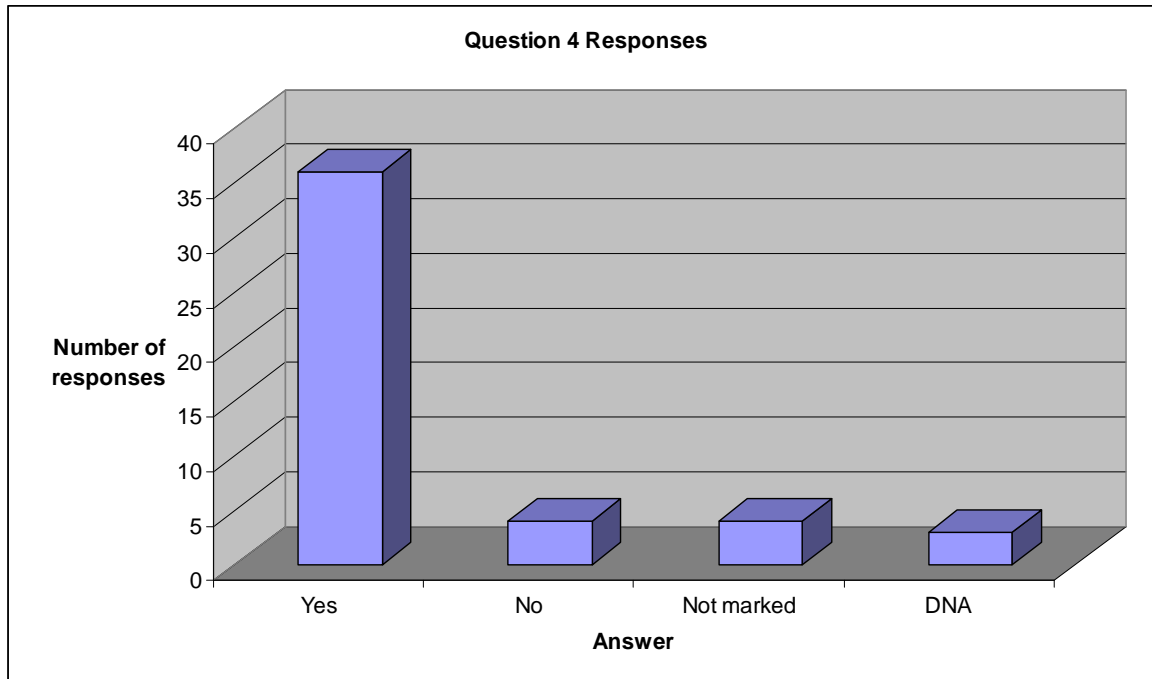
**Question 3: Are there any aspects of the guidance and directions which, as drafted, should not be included? If so, please explain why.**

30 (64%) respondents felt that aspects of the guidance and directions, as drafted, should not be included. 10 (21%) answered no to this question. Four respondents did not mark either box and three did not respond to the question.



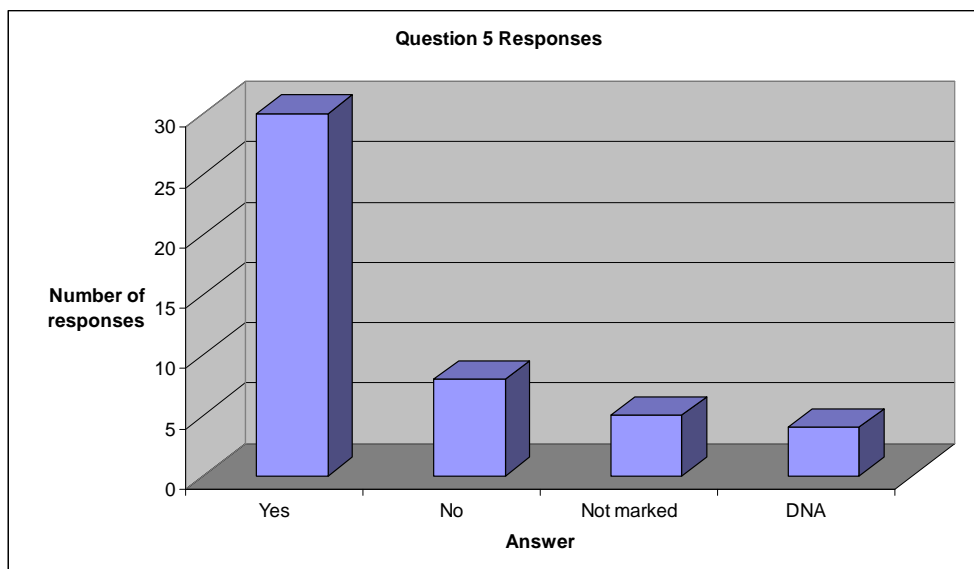
**Question 4: Are there any other provisions not included in the guidance and directions that should be? If so, please explain what they are.**

A majority of respondents, 36 (77%), said other provisions should be included in the guidance. Four answered no to this question. In four instances, neither box was marked, while three respondents did not answer this question.



**Question 5: Are there aspects of the guidance and directions which seem likely to increase your financial or administrative burdens? If so, please explain what they are and, if relevant, what changes would reduce the increase.**

30 (64%) respondents felt aspects of the guidance and directions seemed likely to increase their financial and administrative burdens. 8 (17%) said it would not. Neither box was marked in the case of five respondents – the remaining four did not answer.





# Senior Traffic Commissioner's Proposal

In view of the volume of comments received and the clear steer from respondents that the Statutory Document requires (a) clarification, (b) the removal of some provisions, (c) the inclusion of other provisions and (d) the consideration of likely financial and administrative burdens (as indicated by the above analysis), the Senior Traffic Commissioner has undertaken a substantial review of the draft issued for consultation.

The Senior Traffic Commissioner is therefore proposing to issue a revised draft Statutory Document for a further public consultation.

This document will be published on the traffic commissioner corporate pages of GOV.UK in due course:

[https://www.gov.uk/government/publications?departments%5B%5D=traffic-commissioners&publication\\_filter\\_option=consultations](https://www.gov.uk/government/publications?departments%5B%5D=traffic-commissioners&publication_filter_option=consultations)