

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

Scottish Accessible Transport Alliance (SATA)

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

Surname

Rees

Forename

Alan

2. Postal Address

20 Seaforth Drive

Edinburgh

Postcode EH4 2BZ

Phone 0131 315 3006

Email at.rees@sol.co.uk

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

x

(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 x 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,

(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 x Yes No

but not my name and address

or

Yes, make my response and name available, but not my address

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Pro-forma for use when responding on draft guidance:-

Introduction

SATA is an independent self-funding Scottish Charity with over 80 individual and corporate members active in the voluntary, public and private sectors. It is led by disabled people, works for improvements in transport services, and makes representations on issues of concern to disabled people.

Name of respondent	Alan Rees
Organisation (if applicable)	Scottish Accessible Transport Alliance (SATA)
Interest (eg trade; local authority; passenger interest)	A Scottish charity representing the interests of disabled people in obtaining accessible and affordable transport as a means for obtaining greater mobility and social inclusion.
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?	Yes. The definition appears to be adequate <i>for the general public</i> . But 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. This definition would not apply to these services. Section 19 services are currently far more common and so 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. There is a small amount of administration involved in registering a service with the Traffic Commissioner but the administration involved is unlikely to be onerous. Allowing DRT services to be registered as a local bus affords the

	<p>opportunity to design local transport which better fits the needs of local communities. Some clarification is required on what is meant by 'local services'. These need to interface with longer distance services.</p>
<p>Q3. Do you agree with the proposed conditions for registering DRT services?</p>	<p>Yes, if it is intended that this measure is used only in exceptional circumstances, such as where malpractice by an operator is suspected and the Traffic Commissioner wishes to conduct checks on services.</p>
<p>Q4. Should DRT services receive BSOG payments?</p>	<p>Yes. The inability for a voluntary and community transport organisation to claim BSOG on flexible parts of Section 22 services is acting as a hindrance.</p>
<p>Q5. Do you agree with the proposed conditions for DRT services to receive BSOG payments?</p>	<p>Yes. The proposed conditions do not appear to be onerous. In exchange for accepting a small amount of extra regulation, the Operators will receive a real benefit. We do have concerns about including customers' contact details and these need to be kept brief and confidential.</p> <p>There is a need for more clarity regarding the advance booking arrangements of a registered DRT route. Most DRT services will require bookings to be made at least one day in advance. 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. 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 be of great benefit to passengers.</p>
<p>Q7. Is there any general comment about these proposals you would wish to make?</p>	<p>These proposals will only apply to services which operate under a Section 22 permit.</p> <p>The Community Transport Association (CTA) estimates there are up to around 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</p>

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	<p>22 services. If Section 22 services continue to grow then these proposals will be of benefit.</p> <p>The fact that the BSOG Scheme is budget limited, and the Scotland-wide concessionary travel scheme is capped, will also limit the benefits to be obtained from the proposals</p> <p>We support the CTA suggestion that a further improvement would be 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, more effective approach to improving local transport.</p> <p>The need for accessible information is paramount. This requires making route and timetable information available to the entire customer base. This includes blind/vision impaired people who have very specific information requirements.</p> <p>.</p>

Alan Rees MBE

Secretary, 20 Seaforth Drive, Edinburgh, EH4 2BZ

September 2011