

Bus Subsidy Reform Consultation Response Form

Part 1 - Information about you

Name	David Sidebottom
Address	7 th Floor, Piccadilly Gate, Store Street, Manchester
Postcode	M1 2WD
email	david.sidebottom@passengerfocus.org.uk
Company Name or Organisation (if applicable)	Passenger Focus the operating name of the Passengers' Council
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium bus operator (up to 50 employees)
<input type="checkbox"/>	Large bus operator
<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"/>	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>Passenger Focus is a statutory body established to represent the interests of rail users in Great Britain and of bus, coach and tram passengers in England, outside London. The Chairman and members are appointed in accordance with the provisions of the Railways Act 2005, as amended.</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p> <p>Passenger Focus does not seek to keep its response confidential.</p>	

PART 2 - Your comments

1. Do you agree with how we propose to calculate the amounts to be devolved? If not, what alternative arrangements would you suggest should be used?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<p>Please explain your reasons and add any additional comments you wish to make :</p> <p>As the body representing the interests of bus passengers our focus is more on the outputs to passengers that arise from BSOG rather than the detailed, internal mechanisms used to calculate and allocate payments. Our responses to the questions below reflect this and focus on the overall benefits to passengers. From the passenger perspective, key issues surround ensuring that there is no overall reduction in the amount of money available for investment in public transport; that any shortfall is not made up through an increase in fares; and that passengers who rely on bus are given a sense of security about the stability of services provided. We explore these points more in the sections below.</p>		

2. Do you think that an additional amount should be devolved where a commercial service is replaced by a tendered one?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<p>Please explain your reasons and add any additional comments you wish to make:</p> <p>As stated above calculation is not something addressed by Passenger Focus in this response. However we think there is a case to make additional amounts available to support the greater burden on the public purse, especially if the alternative is for services to be withdrawn.</p>		

3. Do you agree that it would be better for all the relevant funding to be devolved on a single date? Or, are transitional arrangements needed and, if so, what is the best way of doing this?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<p>Please explain your reasons and add any additional comments you wish to make:</p> <p>Passengers will want reassurance that there is no potential impact on services continuing. One of the key criteria to be considered when selecting a mechanism for allocating BSOG is the extent to which it contributes to continuity of service. Our research (Bus service reductions –</p>		

the impact on passengers) shows that passengers rely on buses to get to/from work and education as well as accessing a range of services. Seemingly small changes to service patterns can have a greater overall impact on passengers' lives.

4. Do you agree that funding for incentives should not be devolved to local authorities until the further review of BSOG in 2014?

YES

NO

Please explain your reasons and add any additional comments you wish to make:

Incentives are being used to provide benefits for passengers and to make services more attractive. Passengers will want these benefits at least to be maintained and for any review to identify how future funding for incentives can secure increases to the reliability and quality of service provision.

5. Do you agree that local transport authorities in areas with a Quality Contract Scheme should automatically receive the equivalent to BSOG funding?

YES

NO

Please explain your reasons and add any additional comments you wish to make:

We believe that the chosen mechanism should support provision of benefit to passengers and any changes should ensure passengers have the reassurance of continuing quality service provision.

6. Do you believe that there is a need to ringfence funding for an interim period? If so, what form do you think this ringfencing should take, and, in particular, how much flexibility should local authorities be given as to how to spend the devolved grant?

YES

NO

Please explain your reasons and add any additional comments you wish to make:

We recognise the right of elected members of local authorities to make decisions regarding the funding of local services. However, we believe that ringfencing helps ensure continuity of service. As mentioned above our research (Bus service reductions – the impact on passengers) shows that

changes to bus services can have a big impact on individuals and the community. The four main impacts identified were:

- Passengers could not travel like they used to and make fewer discretionary trips
- Dependency on others for lifts has increased, thus reducing independence.
- Sometimes the passenger paid instead: passengers bore some of the costs by using taxis or other paid means of transport
- Lack of spontaneity: fewer services on fewer days reduced the opportunity to decide on the day to go out

Any potential for funds to be diverted resulting in erosion of services will not be acceptable to passengers. Passengers' priorities need to be placed at the heart of these decisions and the system needs to support the best outcome for passengers being achieved. It will be important that the overall delivery of service and effectiveness of the system is measured and monitored. We believe the benchmark should be measurable outcomes based on increasing levels of passenger satisfaction.

7. Should BSOG for both live and dead mileage be devolved?

YES

NO

Please explain your reasons and add any additional comments you wish to make:

Whatever the mechanism, the ability to run dead mileage to facilitate positioning for the start of a route, particularly in further out and more rural locations, should not be undermined.

8. Should BSOG for part services within a BBA be devolved?

YES

NO

Please explain your reasons and add any additional comments you wish to make:

In order to achieve the aim of increased bus patronage, again the way funding is allocated should not undermine the ability to continue to provide services that passengers rely on.

--

9. Is the proposed method of calculating the BSOG in a BBA suitable?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
--	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

The outcome needs to monitor passenger benefit with robust measurement that allows comparability across areas, to ensure that satisfaction levels remain high both for new and existing passengers and there is an increase of quality and satisfaction.

10. Do you agree that the approach proposed to partnership within a BBA strikes the right balance between local transport authorities and bus operators?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
--	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

Bus Passenger Survey research shows that passengers want to see increased value for money and reliability and improved information. It is only by approaching these issues in partnership, with joint action plans and transparency of results that authorities and operators together can deliver increased quality of integrated service and innovation to the benefit of passengers.

11. Do you agree that any authority both developing a QCS and seeking BBA status should need to demonstrate the same standard of partnership working and support from local bus operators for the BBA bid as any other bidding authority?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
---	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

Again, successful delivery of the improved offering passengers want is more likely where there is a strong partnership approach from authorities and operators.

--

12. Is this transitional period for phasing out BSOG sufficient?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
--	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

As with any phasing out, it will require monitoring to ensure that on-going provision of services for passengers is not undermined. Local authorities face a difficult challenge and this should be supported by best practice guidance on effective consultation. Our toolkit - Bus Service Reviews: consulting on changes to local services - has been put together following research into the effects of service changes on passengers. Connecting with passengers early enough can help make changes that least inconvenience those who rely on them.

13. Do you agree that each of the services listed in Section 4.66 should not be eligible for BSOG in future? If you do not agree, please explain why.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
---	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

As stated under question 6, passengers rely on the mix of services provided for them. Changes in funding eligibility should not result in those services not being provided

14. Are there any other categories of service which are eligible for BSOG at present which you believe should not be eligible in future, and if so which are they?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
--	------------------------------	-----------------------------

Please explain your reasons and add any additional comments you wish to make:

n/a

15. Alternatively, are there any categories of service which are not eligible at present but which you think should be in future?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: n/a		

16. Should buses operating under a Section 19 permit continue to receive BSOG in BBAs where they are not run in-house by the local authority?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: Passengers need to have the reassurance that the services they rely on will be able to continue being provided		