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| Consultation response |
| Statutory Document No. 14 on Local Bus Services: Guidance and Directions on punctuality |
| Senior Traffic Commissioner |
| May 2014 |

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# Overall comment

* 1. We welcome the way in which he current draft is more clearly constructed; has jettisoned some of its more emotive language; and also gives a more balanced recognition of the relative and different roles of highways authorities and operators on bus performance.
  2. We are however disappointed both by the process that has led to the U-turn on tightening up on punctuality standards, and also by the lowering of standards for punctuality in the revised draft.
  3. The initial draft was clear that punctuality standards needed to be **more** exacting. The current draft (without any accompanying explanation as to why) has reversed that position and made the punctuality standards **less** demanding than they currently are.
  4. We are particularly concerned that there is a now a one-size fits all seven minute window of tolerance. We are concerned that:

• This is inappropriately lenient for rural and off-peak services which should be able to operate to time given the lack of traffic congestion or other impediments to punctuality

• A baseline of seven minutes runs the risk of being eight or nine minutes in practice.

• Whilst it is generally frustrating that there is no explanation of how the current draft differs from the first draft or why, this is particularly acute here as there is no reasoning as to why seven minutes has been chosen (why not six or eight for example?). As far as there is an evidence base (though not referenced in the draft) the Passenger Focus research suggests that passengers feel that a five minute window of tolerance ‘feels about right’.

* 1. Some of our members have pointed out that in urban conditions a more lenient approach to punctuality (except in the case of start times) is both justified and realistic given the way in which variable traffic conditions affect bus journey times. This underlines the problem of a one-size fits all punctuality regime which by its nature can’t take into account that what may be a stretching but realistic target in one area, will be far too lenient in another, or impractical in another. This underlines the case for the devolution of the punctuality regime for punctuality standard setting, monitoring and enforcement - where Local Transport Authorities have the resources and ambition to do so
  2. We are also concerned about the lowering of standards on timing points. A more lenient approach may well be justified in rural areas but is not appropriate for busy urban routes. Again this underlines the case for a more devolved punctuality regime.
  3. Although the current draft is stronger on the need for more performance data to be available we believe that it could be further strengthened. The guidance might also provide greater clarity on access to performance data in general and RTI data in particular. At present RTI data is often covered by confidentiality agreements imposed by operators (and endorsed by the DfT’s PIP guidance) which means that the bodies responsible for overseeing performance (Passenger Focus, VOSA and the Traffic Commissioners) are often unable to have access to it. This is manifestly absurd when a) RTI data has been subsidised by the taxpayer through the BSOG incentive regime b) when performance data is readily available for rail c) the Government has a wider commitment to open data d) there is a consensus amongst all parties in the bus debate on the importance of bus punctuality. This could be addressed by changes to BSOG conditions for example. This might be outwith the STC’s control but given the stress on recording and monitoring of performance information the guidance remains is somewhat vague about the status of the data, who is allowed access to it, and what the STC in particular will do with it. We would suggest that the guidance should at the very least say that the STC expects that RTI punctuality data should be available to a) Passenger Focus, VOSA and the Traffic Commissioners, and b) the wider public, in a way that allows the bodies charged with overseeing bus performance to assess the performance of bus services and the causes of punctuality issues, and which enables the general public to have a reasonable overview of the punctuality and reliability of bus services in their area. The way this is achieved in each area could be agreed by the Traffic Commissioners and the Local Transport Authorities / operators in each area.

# Comments on the annex

* 1. Partnership Principles Para 3 ‘Both parties recognise and accept that the provision of a reliable, efficient service to bus passengers is essential, and that buses should be treated in a different way from general traffic, so that interference with their services by road works is minimised’. Further consideration should be given about the ‘different treatment’ of buses over general traffic, this appears to conflict with TMA requirements, therefore a better wording would be ‘Both parties recognise and accept that the provision of a reliable, efficient service to bus passengers is essential, and that the effect of road works on bus operations should be minimised through agreed temporary traffic management arrangements’
  2. Obligations of the Council Paragraph 2 seems confusing. The determination of planning applications does not necessarily mean an instant start of works on-site – in fact this would be unusual. A change of wording to ensure developers were notified, as part of any planning permission, of the need for the 56 day registration notice period would be clearer and more relevant.