



Consultation response

To: the Audit Commission's consultation on Comprehensive Area Assessment (CAA)

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Introduction

pteg represents the six English Passenger Transport Executives (PTEs) in England which between them serve more than ten million people in Tyne and Wear ('Nexus'), West Yorkshire ('Metro'), South Yorkshire, Greater Manchester, Merseyside ('Merseytravel') and the West Midlands ('Centro'). The PTEs plan, procure, provide and promote public transport in some of Britain's city regions, with the aim of providing integrated public transport networks accessible to all. The PTEs (including SPT) have a combined budget of more than a billion pounds a year of which about £300million is capital expenditure, and are funded by a combination of local council tax and grants from national government. They are responsible to Passenger Transport Authorities (PTAs) made up of representatives of local councils in the areas they serve.

The response does not answer the questions set out by the consultation paper, as the role of PTA/Es does not appear in it. Instead, our response takes the form of the general comments below.

As always we are happy to contribute to further discussion as Government firms up in its views in these areas, and would be pleased to clarify our views or to develop them further. Please use Louisa Moore on louisa.moore@pteg.net a first point of contact.

General comments

Need for specific inclusion of PTEs within the CAA process

While the *Local Government and Public Involvement in Health Act* details Metropolitan PTAs as 'named partners' - who must be consulted on Local Area Agreements (LAAs) and demonstrate 'alignment' towards agreed LAA outcomes - the consultation document 'Comprehensive Area Assessment' does not refer to PTAs or PTEs. **pteg** believes this inconsistency should be corrected and the role of PTA/Es made explicit, owing to the important role public transport has to play in supporting economic regeneration, environmental sustainability, tackling travel related barriers to social inclusion and reducing traffic congestion, among other key policy areas. Indeed, in published guidance the Department of Communities & Local Government (DCLG) points up the role to be played by PTA/Es as city region wide authorities in the development of Multi-Area Agreements (MAAs)¹. Two of the new national indicator set explicitly seek to measure (non car-based) access to a range of services that have central significance to the quality of life of local residents, notably in the areas of work, education and training and health facilities. The value of these vital facilities can be either enhanced or severely damaged by the improvement or lack of public transport services and facilities. We would therefore look to see transport being recognised in the CAA framework as an integral aspect in the delivery of core public services.

¹ HM Government, *Development of the New LAA Framework: Operational Guidance*, DCLG, London, 2007, p47, <<http://www.communities.gov.uk/documents/localgovernment/pdf/550738>>

The inspection regime

However the inspection regime is implemented - incorporating only a 'use of resources' review or the additional 'direction of travel' element - it is essential that it is consistent with the approach being adopted by the DfT in assessing Local Transport Plans (LTPs). There is also a need to establish what role the PTA/Es will play during any use of resources review.

Multiple authority audits

The CAA consultation paper indicates that cross-authority audits should only take place where an MAA is in place. A formally shared LTP (such as already exists in Metropolitan areas where LTPs are shared by PTEs and the constituent local authorities) already provides for many of the elements of an MAA. This has been recognised in the DCLG guidance on MAAs. *pteg* requests the CAA guidance be amended to include existing formal inter-authority working, such as LTPs, as well as newer MAAs.

The Audit Commission will also want to check on how well PTA/Es are carrying out the new 'duty to have regard to' and the 'duty to cooperate' in LAA target setting, and delivery against those targets whether national or local. The Audit Commission will presumably wish to have access to our PTEs' performance management information, and will be checking on our arrangements for ensuring data quality.

Engaging with people

It should be clarified whether engaging with 'citizens and people who use services' will involve separate consultation exercises or whether it is envisaged that existing consultation will be used as evidence. The mode of engagement will be crucial to PTA/Es in developing the role they will play in the CAA process.

LAAs may contain local priorities, indicators and targets to which public transport can make a contribution over and above the national indicator set. In addition, MAAs involving transport will come into existence along with the possibility of enhanced transport governance arrangements in the new era of Integrated Transport Authorities and City Regions.

While the proposed Best Value User Satisfaction survey no longer includes questions relating to transport it seems unlikely that the views of local communities will not reflect their attitude towards public transport.

Risk assessments

A poor score on use of resources could trigger inspection activity. The area risk assessment itself could subsequently identify poorly performing public transport as an area of weakness or a barrier to achieving desired improvement (in areas such as reducing congestion or improving access to

employment). This does not consider the fact that the bulk of passenger transport provision is out of the regulatory control of the PTA/Es (15 per cent of bus services are publicly procured in PTE areas). **pteg** therefore seeks clarification as to whether risk assessments will consider all bus services, or tendered bus services only.