

*promoting quality public transport.....*

Grace Hansford,  
3/11 Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

21<sup>st</sup> July 2009

Dear Ms Hansford

**Response by TravelWatch NorthWest to DfT's consultation on possible changes to the administration of concessionary travel.**

TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing users of all forms of public transport in North West England. We welcome the opportunity to respond to this consultation.

TWNW shares DfT's belief that the scheme has been hugely popular and very successful. It has helped meet government targets for public transport use and especially for a more sustainable modal split.

**Questions asked in consultations**

- What is the optimum administrative level? – TWNW agrees that the top tier Local Transport Authorities (LTAs) should be tasked in the short run with administering the scheme. In the longer term if it is decided to combine Bus Service Operator Grant (BSOG) with concessionary fares reimbursement then an administration at National level as in Wales and Scotland might be preferable. Whilst LTAs and Travel Concession Authorities (TCAs) are not currently co-terminal, LTAs do generally have more experienced public transport administrative systems. Administration at top tier Local Government level would also create a smaller number of TCAs and consequently the level of appeals could be expected to be reduced.
- Should discretionary concessions also be administered at the same level? TWNW believe that this would be sensible. Many of the 78 joint schemes already do this. However existing District Council TCAs should not be prevented from agreeing and administering (at their own expense) their own discretionary schemes should they so wish.

- What currently are the main administrative problems? – High levels of financial appeals are a major problem. There are also many disagreements as to which TCAs “win” or “lose” from formula and special funding (e.g. rural authorities may have few buses but many pensioners). TWNW however, in agreeing that top tier LTAs should in the short term administer the scheme, notes that they can (and many do) pool existing TCAs’ funding so as to smooth out these anomalies. Uneven roll out of smartcards and hence accurate data capture on which to base reimbursement calculations is another problem which needs addressing. This would also prevent unnecessary cross boundary disputes (although with countrywide entitlement to off peak free bus travel these are now applicable only to discretionary schemes, such as GMITA rail and metrolink concessionary travel). Additional problems arise over reimbursement being based on where a journey commences rather than where the concessionary passenger resides. TWNW expects that these matters will be addressed in the promised follow on consultation?

## **Conclusions**

The introduction of the scheme has without doubt created a number of “teething difficulties”. Since these have in the main resulted from issues surrounding funding and operator reimbursements it seems illogical to make these matters the subject of separate future consultation, as the eventual manner of their resolution must impinge on the core issue of how the scheme is administrated.

Nevertheless TWNW will be happy to be invited to comment on this next consultative round.

*(author Paul Fawcett)*

Yours sincerely

JOHN MOORHOUSE  
COMPANY SECRETARY