



CONSULTATION RESPONSE FORM

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Company name or organisation (if applicable)	TravelWatch NorthWest
If you would like your response or personal details to be treated confidentially please explain why:	

Question 1: for example - Do the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?

Answer 1:

Largely but see below.

Question 2: for example - Do any parts of the guidance and/or directions require clarification? If so, please refer to the paragraph number and explain why.

Yes

Answer 2:

Para 10 could make reference to Special Restricted PSC O-Licences since the Local Transport Act 2008 allows Taxis and now Private Hire Vehicles to use these to provide Registered Local Services (RLSs)

We agree completely with taking out the one minute early tolerance for the reasons you cite. The “**window of tolerance**” for frequent services might be more simply defined as “not less than six buses per hour with a maximum headway of 15 minutes”. This is from every timing point and we would add that the location of timing points should be made clearer to passengers.

Para 56 – “Furthermore where the new operator has a reasonable relationship with the operator who has lost the tender it will be of benefit to speak with them to establish whether there are difficulties on route and to then seek and obtain evidence.” We would suggest that operators should be required to do so whatever the relationship.

On the question of road works we wholeheartedly agree there is a need for much better dialogue and partnership working amongst the various agencies. This should include a maximum number of preplanned works over specific sections of road (this would vary depending on the nature/ length of each work site) to ensure minimum delays

Question 3: for example - Are there any aspects of guidance and directions which, as drafted, should not be included? If so, please explain why.	Yes <input type="checkbox"/>	[No]
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Answer 3:
We do not feel anything should be excluded.

Question 4: for example - Are there other provisions not included in these guidance and directions that should be? If so, please explain what they are.	Yes	
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Answer 4:

Complaints procedures

- A reference could be made in the guidance/ directions (if appropriate) to Complaints procedures – we would like to see a notice prominently displayed in all vehicles used on Registered Local Services explaining how and to whom comments and complaints can be made and giving contact details of the appeals procedure. However we believe there is confusion amongst those wishing to comment or complain about bus services concerning the respective, and in some cases overlapping, roles of **TC's, Passenger Focus, Bus Users UK and the Bus Appeals Body**.
- The BAB's current remit with regard to complaint handling is very limited. **It is not a statutory body**. We understand that its terms of reference only permit it to deal with complaints from bus users regarding specific incidents or operational matters such as running to time, charging the correct fare and the behaviour of staff towards passengers. It cannot deal with commercial or operational matters such as the level of fares, the level of service provided, or the routes taken by buses.
- With respect we think that further confusion for passengers is engendered by the role of the Traffic Commissioners in complaints handling and it is likely that few passengers are aware of this role. We are well aware of and appreciate the diligence that TCs display in representing bus passengers interests. On balance however we believe that passengers will want **one** point of contact for complaints appeals and ideally that should be the statutory passengers representative which is Passenger Focus (PF). To give a parallel, train operators' licenses require them to display not only their own details but also PF's name and contact details and a note advising passengers who are unhappy with a train operator's reply (or lack of reply) to contact PF. We consider that no less a requirement should be placed on bus operators and enforced by the Traffic Commissioners. It should be clear to whom passengers can appeal i.e to **one** body (PF) which has statutory powers to help passengers

Other issues

- Section 19 Community Transport which can provide "non registered" local services, including some Demand Responsive Services. A key point here and to the points below is to ensure quality and safety of vehicles and drivers as well as a consistent standard across the country rather than standards set by LA's and other bodies.
- Section 22 Community Buses which can register local services

- “Free” Buses such as some subsidised urban centre shuttles or those on contract to retailers to carry their customers and on which **no separate fares** are charged.
- Small Passenger Carrying vehicles operating registered local services using Restricted PSV O-Licences or otherwise licenced by their local Taxi Licensing Authorities.
- Taxi Buses, both Taxis and Private Hire Vehicles (see above)
- Limousines (for the sake of completeness) which also if licenced by their TC as above might conceivably seek to register a local bus service.

Question 5: for example - Are there aspects of these Guidance and Directions which seem likely to increase your financial or administrative burdens? If so please explain what they are and, if relevant, what changes would reduce the increase.	[Yes]	No <input type="checkbox"/>
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Answer 5:
We do not think it appropriate for us to respond to this question