

TravelWatch NORTHWEST

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Winner of CILT award for best practice in passenger transport

promoting quality public transport.....

Mrs Beverley Bell
 Senior Traffic Commissioner
 Suite 6
 Stone Cross Place
 Stone Cross Lane North
 Golborne
 Warrington WA3 2SH

13th November 2013

Dear Beverley,

SENIOR TRAFFIC COMMISSIONER'S STATUTORY GUIDANCE NO 14

As you know TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in North West England.

We find the guidance helpful and believe that so too will Bus Operating Companies (BOCs) and Local Transport Authorities. It is in many ways a model of good practice codifying the functions of the Traffic Commissioners (TCs), primarily for whom it has been prepared. In addition we think it will quickly become essential reading for stakeholders who should welcome the clarity of its explanations.

We welcome an emphasis on the need for **proactive route monitoring** and trust that when this is performed well **passenger** benefits will arise. We have no specific comment on the form this should take, apart from a need for some degree of standardisation. Developments in communication and information technology are proceeding apace and each LTA and BOC will have their own preferences.

On the question of road works we agree there is a need for much better dialogue amongst the various agencies as you have set out in the draft road works protocol which should include agreement on 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.

We share the House of Commons Transport Committee's (HOCTC) concern regarding inadequate levels of support for VOSA on whose services TCs rely heavily.

We are also concerned about the poor level in some areas of information about both timetables and, particularly, fares on local bus services (see "Information on Bus Fares", June 2009 on our website). The issue was highlighted recently by Passenger Focus in its recent report (22nd October 2013) on Bus Passenger views on value for money. We are undertaking further work on this subject and will keep you informed.

The **revisions to financial penalties** are also a move in the right direction, especially when seen in the context of alternative non-financial penalties such as specific performance which TCs can now impose. However we would caution that care will be needed if any unintended consequences (such as collateral harm to a BOCs' competitors) are to be avoided.

Another area of concern is the whole area of **complaint handling** and we comment on this and other issues in more detail in the consultation response form appended.

I am also appending three other papers which we have submitted which may be of value –

- Extension of the remit of Passenger Focus to bus and coach issues and the requirement to display information to DfT in October 2009
- Improving Bus Passenger Services through the Regulatory Framework to DfT in May 2010
- Response to the House of Commons Transport Committee Inquiry into Bus Services after the Spending Review in December 2010

Should you wish us to enlarge on our responses either in writing or verbally we will be glad to do so.

Thank you for the opportunity to respond

Yours sincerely



John Moorhouse
Company Secretary