

PROPOSED BUS REGULATION (SCOTLAND) BILL – IAIN GRAY MSP

SUMMARY OF CONSULTATION RESPONSES

1. This document summarises and analyses the responses to a consultation exercise carried out on the above proposal.
2. The background to the proposal is set out in section 1, while section 2 gives an overview of the results. A detailed analysis of the responses to the consultation questions is given in section 3. These three sections have been prepared by the Scottish Parliament's Non-Government Bills Unit (NGBU). Section 4 has been prepared by Iain Gray MSP and includes his commentary on the results of the consultation.
3. Where respondents have requested that certain information be treated as confidential, or that the response remain anonymous, these requests have been respected in this summary.
4. In some places, the summary includes quantitative data about responses, including numbers and proportions of respondents who have indicated support for, or opposition to, the proposal (or particular aspects of it). In interpreting this data, it should be borne in mind that respondents are self-selecting and it should not be assumed that their individual or collective views are representative of wider stakeholder or public opinion. The principal aim of the document is to identify the main points made by respondents, giving weight in particular to those supported by arguments and evidence and those from respondents with relevant experience and expertise. A consultation is not an opinion poll, and the best arguments may not be those that obtain majority support.
5. Copies of the individual responses are available on the following website https://www.scribd.com/iaingraymsp/documents?sort_by=title. Responses have been numbered for ease of reference, and the relevant number is included in brackets after the name of the respondent.
6. A list of respondents is set out in the Annexe.

SECTION 1: INTRODUCTION AND BACKGROUND

7. Iain Gray's draft proposal, lodged on 1 May 2013, is for a Bill to:

“provide transport authorities with greater powers to set service levels for local bus services, including a power to group profitable routes with non-profitable routes before they are put out to tender with operators”.

8. The proposal was accompanied by a consultation document, prepared with the assistance of NGBU. This document was published on the Parliament's website, from where it remains accessible:

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/29731.aspx>.

9. The consultation period ran from 1 May 2013 to 30 August and was then extended to 11 October 2013.

10. The following organisations and individuals were sent copies of the consultation document or links to it:

- 26 community transport groups and charities
- 48 bus operators
- 7 transport partnerships
- 32 local councils
- 19 third-sector organisations
- 29 trade unions
- 20 community councils

11. Several further steps were taken to publicise the consultation, which included press releases, and several public meetings across Scotland. 250 copies of the consultation document were distributed at these meetings, which were organised both by other members of parliament, and by local transport groups.

12. The consultation exercise was run by Iain Gray's parliamentary office.

13. The consultation process is part of the procedure that MSPs must follow in order to obtain the right to introduce a Member's Bill. Further information about the procedure can be found in the Parliament's standing orders (see Rule 9.14) and in the *Guidance on Public Bills*, both of which are available on the Parliament's website:

- Standing orders (Chapter 9):
<http://www.scottish.parliament.uk/parliamentarybusiness/26514.aspx>
- Guidance (Part 3):
<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/25690.aspx>

SECTION 2: OVERVIEW OF RESPONSES

14. In total, 106 responses were received, of which 82 (77%) supported the proposal. An additional two respondents gave partial support which brings the overall support for the proposal to 79%. Ten (9%) respondents did not state whether they were for or against the proposal. Seven (7%) were against the proposal and five (5%) remained undecided.

15. A petition for Better Buses was sponsored by Elaine Smith MSP and this was forwarded to the member. A total of 1896 signed the petition “calling on the Scottish Government to introduce greater regulation of bus services to protect vital local bus services”.

16. Mark Griffin MSP gathered 43 signatories supporting the general principles outlined in the consultation document and agreeing with the following statement: “For some time now bus services in many areas of Cumbernauld have been inadequate. However, recent First timetable changes have left some areas without even a basic bus service. I believe that your proposals for a Bill to provide transport authorities with greater powers to set service levels could improve public transport and protect vital bus routes in Cumbernauld”.

17. Neil Bibby MSP and Mary Fee MSP conducted a local survey in Renfrewshire during the month of September 2013 calling for better local buses. They attached 44 responses along with the survey results. The extract from, and the summary of the survey, can be accessed as part of their response (69) to the consultation on the member’s webpage <https://www.scribd.com/iaingraymsp>.

18. The responses can be categorised as follows:

- 41 (38%) from individuals (members of the public)
- 14 (13%) from local authorities
- 10 (9%) bodies representative of equality viewpoints (age, disability, gender)
- 7 (6%) from politicians (MSPs and MPs)
- 6 (6%) regional transport authorities
- 6 (6%) from community councils
- 6 (6%) transport representative organisations
- 5 (5%) bus operators
- 3 (3%) transport campaigning groups
- 3 (3%) trade unions
- 2 (2%) student associations/unions
- 1 (1%) academic
- 1 (1%) Youth Parliament
- 1 (1%) private sector business organisation

19. One response (8) was submitted anonymously. The responses from Stirling (10) and Clackmannanshire (9) Councils were very similar, as were those from Inverclyde (15) and Renfrewshire Councils (60).

20. There was significant backing for the proposed Bill, with over three-quarters of respondents supportive of the 're-regulation' of bus services in Scotland by increasing transport authorities' powers to set service levels and group profitable routes with non-profitable routes before they are put out to tender with operators.
21. The main reasons given for supporting the proposed Bill were that the current de-regulated system was not working. Respondents gave examples of poor service provision particularly in rural areas but also in urban areas where night time buses or buses to essential services, such as hospitals, had been withdrawn. Respondents felt that bus fares had increased while standards of service had declined – which in turn, respondents said, had resulted in a decline in bus usage.
22. Many respondents considered that by giving transport authorities more powers the proposal would provide greater opportunity to address issues relating to accessibility for disabled people and social inclusion more widely, as well as being beneficial to the environment by encouraging more people to use buses instead of relying on cars. Some respondents also considered there were advantages to transport authority control in that there might be a prospect of improving the interconnectedness of bus routes and bus services with the wider transport network.
23. There was an acknowledgement from respondents of the value of community transport and a range of suggestions made about how community transport could be better utilised, for example by making use of local authority fleets.
24. One of the main issues raised by respondents was that additional resources would be required by transport authorities to improve infrastructure and to monitor service levels.
25. The majority of respondents considered that rather than giving the Traffic Commission greater powers to levy penalties on bus operators, penalties should be included in bus operators franchise contracts.
26. The main concern of those who opposed the proposal was that by removing the commercial incentive for bus operators, customers would receive a poorer service and consequently tax payers would face a greater burden. Another concern was that the move to re-regulate bus services would interfere with operators' freedom to act commercially and this would not be compliant with EU Human Rights legislation. Another implication of the proposal was that successful businesses could be destroyed and that re-regulation wouldn't offer employees protection of job security, pay or pensions.

SECTION 3: RESPONSES TO CONSULTATION QUESTIONS

27. This section sets out an overview of responses to each question in the consultation document.

28. The consultation document outlined the aim of the proposed Bill and what it would involve. It set eight questions for respondents to answer:

Question 1: Do you support the general aim of the proposed Bill? Please indicate “yes/no/undecided” and explain the reasons for your response.

29. Ninety-six respondents answered this question. Other responses may have indicated in other ways whether or not they supported the general aims of the Bill, but these have not been included in the following analysis.

30. A significant majority responding to this question, 82 (85%), supported the proposed Bill, with a further two (2%) giving partial support. 15 (16%) were undecided or expressed no clear view. Only seven (7%) were opposed in principle.

31. A substantial number of respondents, whether supportive of the Bill's general aim or not, raised concerns about the cost to local authorities of implementing the proposed powers. These included local authorities and transport authorities.

32. The main reasons given for supporting the proposed Bill were:

- the current de-regulated system is not working
- bus services should be run as a public service
- local authorities need additional powers to improve bus services
- geographical variations in bus services.

33. The main reasons given for opposing the proposed Bill were:

- may lead to the removal of commercial incentives for bus operators
- potentially time-consuming and costly to the tax-payer to implement
- possible incompatibility with EU Human Rights legislation.

34. Other points mentioned were:

- need to include accessibility requirements for people with disabilities
- current subsidy contracts already regulate matters such as timetable, fares and reliability
- more detail required on how franchising of routes would work in practice
- bus services should be better integrated with other forms of public transport.

Reasons for supporting the proposed Bill

The current de-regulated system is not working

35. Many respondents commented that the current system was failing to provide an acceptable level of service to the public in many geographical areas—

“De-regulation of bus services has failed and let down communities throughout Scotland including many in my constituency who have seen their bus services cut for no longer being “commercially viable” ... This bill would give transport authorities powers to ensure that bus services meet the needs of communities and once more make bus services a real public service”.

(Katy Clark MP (57))

36. Clackmannanshire (9) and Stirling Councils (10) both stated that “de-regulation has not worked well in our area ... We would expect the measures proposed to meet the general aim of achieving a better system”.

37. Joseph McDermott (50) commented “Since de-regulation we have seen the bus transport industry as a free for all, with operators picking and choosing what routes they wish to operate, with non-profitable routes being cast aside”.

Bus services should be run as a public service

38. A significant number of respondents expressed the belief that bus services should be run primarily as a public service and as such, should be subject to regulation by local authorities.

39. Many made the point that, under the current system, bus fares had risen steadily while standards of service had fallen in many areas. As a result, passenger numbers have been in decline which has a detrimental effect on the environment, economy and people’s lives.

40. Highland and Islands Transport Partnership (94) commented—

“HITRANS recognises that the current arrangement for delivering bus services can fail to protect those that depend on local services. We recognise the significant social problems that can occur due to lack of public transport provision and the isolation and lack of opportunity that can result, particularly in rural areas but also in towns and urban areas, particularly in the evenings and at weekends”.

41. Glasgow City Council Labour Group (79) offered their support for the Bill, stating—

“A properly regulated bus service would improve existing bus routes, guarantee reliable and efficient services for isolated communities and play a firm role in encouraging job creation, redevelopment and regeneration”.

Local authorities need additional powers in order to improve bus services

42. Many respondents supported the proposed additional powers for councils, believing that councils needed to have the ability to set minimum service levels and penalise where they were not met in order for regulation to work.

43. Aberdeen City Council (16) and Aberdeenshire Council (17) both agreed that authorities should have powers to enter into franchise agreements. However, both expressed concern about the deliverability of such a scheme given current financial constraints.

44. A number of respondents commented that the removal of the need to prove “market failure” before taking steps to improve bus services would enable a pro-active approach to delivering high-quality services.

45. Jayne Baxter MSP (92) echoed the view of many respondents in calling for—

“greater powers for transport authorities to enable them to take action, not only when putting services out to tender but to take action when service providers fall short of what is required or walk away from a contract.”

Geographical variations in bus services

46. A significant number of respondents were of the view that, as standards of bus service provision varied considerably across Scotland, some powers would be more useful than others depending on the situation within a given region.

47. The Chairs of the Regional Transport Partnerships (105) said—

“In urban areas, while on the surface there may appear to be significant commercial provision, there are still significant gaps (e.g. at evenings, weekends) and the contraction of commercial service provision in these areas over the last few years is a concern. In rural areas, where service specification and funding already derive overwhelmingly from the public sector and also, in some circumstances, the voluntary and community sectors, there continue to be many communities who, at best, receive a minimal service, and at worst, no service at all.”

48. North Area Transport Association (NATA) (106) stated—

“There are definite gaps in the provision of public transport, most prominently in areas that are deemed to be unprofitable.”

49. South East of Scotland Transport Partnership (32) and Stand Up for our Buses (41), while supportive of the powers being available, felt that there should not be a duty to implement franchising given that the situation varies widely between rural and urban areas.

Other comments

50. Other supportive comments made included—

“Scotland needs an integrated transport system such as that in London”.

(Scottish Association for Public Transport (23))

“With the significant sums of public funding support being provided to the bus industry in the form of concessionary travel and infrastructure (e.g. “Streamline” Quality Bus Corridors), legislation should also be updated to take account of the need to demonstrate best value”.

(Glasgow City Council (67))

51. The Equality and Human Rights Commission (EHRC) (46) supported the policy intentions of the proposed bill. The public sector equality duty requires equality to be considered in all the functions of public authorities, including decision-making, in the design of internal and external policies and in the delivery of services, and for these issues to be kept under review. The Commission believed there may be opportunities to align the proposal with the regulatory levers to increase its impact.

Reasons for opposing the proposed Bill

Removal of commercial incentive

52. A small percentage of respondents, including bus operators, were against imposing regulation, believing it would make matters worse rather than better.

53. Bus operator Stagecoach (88) raised a number of issues with the proposal, including—

“The proposed system of regulated monopoly would take 2-3 years to implement at considerable cost, could destroy successful businesses, would offer no protection to employee job security, pay or pensions, and would shake shareholder confidence in the Scottish bus industry”.

54. First UK Bus (103), while supportive of the aim to improve bus travel for passengers, said—

“However, the solutions proposed in the Bill are fundamentally flawed and if adopted it’s highly unlikely that the stated objectives can be achieved at a reasonable cost to the taxpayer. Customers would receive poorer services and tax payers would inevitably face a greater burden”.

55. Two individual respondents expressed concerns about the proposal. Ian Bieniowski (80) was unconvinced that moving control from business experts to local or national politicians was the right direction. While Max Cairns (95) believed re-regulating would make bus services worse because it would remove the commercial incentive to provide a service or be innovative, as providers would have to “keep costs down in order to win the contract to operate the services”.

Compatibility with EU Human Rights legislation

56. Stagecoach (88) questioned whether legislation to confiscate the freedom to operate commercially would comply with EU Human Rights legislation. They also argued that a “return to a system of regulated monopoly would increase costs to the taxpayer and would result in either higher fares or lower service

levels or both for the passenger. This system resulted in declining bus patronage for over 35 years from 1950 to 1986.”

Question 2: What would be the main practical advantages of the legislation proposed? What would be the disadvantages?

57. 73 respondents answered this question.

Advantages

58. There was widespread support for the Bill proposals amongst local authorities, Regional Transport Partnerships, interest/campaign groups, community councils, membership organisations (including trade and student unions) and individuals amongst others. The main advantages identified included:

- greater powers for local authorities to meet local need
- social benefits
- economic benefits
- environmental benefits
- better integrated transport network.

Greater powers for local authorities to meet local need

59. The majority of respondents favoured giving local authorities greater powers to enable them to arrange bus services to meet the needs of their local area. Most of the local authorities who responded expressed support for additional powers to:

- franchise profitable and non-profitable routes
- set minimum levels of service
- impose financial penalties where bus operators are failing
- remove the need to prove “market failure”.

60. Key outcomes identified were the ability to:

- specify services, quality, quantity and value in order to improve service provision and stability
- provide socially necessary, but generally unprofitable, services.
- measure performance
- explore opportunities to integrate services with other modes of transport and with adjoining areas.

61. West Lothian Council (35) noted—

“that there is a significant volume of public finance being invested in bus services with the national concessionary travel scheme, bus service operators grant and payments for council contracts without any significant degree of public sector influence over service design. The council is committed to securing a much greater role for local people to influence bus

services and doing so in a deregulated environment will be difficult. Giving councils powers to determine standards of services to be provided in a franchise will overcome this”.

62. Orkney Islands Council (100) said the proposal would assist local authorities to work more “closely with the operators on the timetable and frequency of services, fare structure and the way the service is operated, passenger figures can increase and improvements to the quality and reliability of services can be achieved”.

63. Clackmannanshire Council (9) and Stirling Council (10) both said that removing the need to prove market failure “would remove a major impediment to securing balanced service provision in a given area”.

64. West Lothian Council (35) considered a partnership approach might be best as “some skills such as those in bus network design are not widely available in the public sector”.

65. Fife Council (36) suggested that a national minimum standard of bus service provision could be established rather than the local minimum standard proposed.

66. SEStrans (32) considered franchising packages would need to be relatively small and some infrastructure may need to be provided to encourage smaller local operators to tender.

Social benefits

67. Many respondents emphasised that the powers in the proposed Bill would allow for improved bus services for those living in rural communities, in terms of ensuring gaps in service are filled, frequency is regulated and socially useful (but not necessarily commercial or profitable) services are maintained.

68. Key advantages identified included:

- improved focus on customers
- sustainable access to services/continuity of services
- bridge gaps in services/better co-ordination of routes
- greater public consultation
- reduction in social isolation
- control/agree ticket prices to ensure affordability for customers
- greater confidence in bus services by passengers
- removal of rules which frustrate integrated transport.
- greater democratic control and local involvement in delivering a public service
- better stability in the bus network
- increased uniformity in the provision of information
- better co-ordination of services
- ticketing integration.

Economic benefits

69. Many respondents noted the high level of public subsidy already existing within the bus industry and believed that the proposed powers could help to achieve a better return on public spending.

70. Another key benefit identified was the power to impose financial penalties on operators who do not meet the requirements of their contract. Many respondents said this would improve network stability by encouraging bus operators to live up to their contract and inhibiting them from premature withdrawal from franchises.

71. Other key benefits included:

- removal of the need to prove market failure will make it easier to improve services
- potential to increase competition amongst bus companies
- powers could also lead to potential business growth
- increased bus company profits.

Environmental benefits

72. The consultation paper outlined how bus usage has been in decline. Some respondents emphasised the potential benefit to the environment of encouraging more people to use the bus service rather than their own transport. Two individuals (48) and (49) commented, “Bus de-regulation ... has failed the environment by pushing more and more people into car ownership.” Specific environmental benefits noted were:

- fewer cars on the road
- reduced urban road congestion
- reduced pollution from car exhaust emissions.

73. Cronberry, Logan and Lugar Community Council (42) considered “the ability to set standards of service gives transport partnerships the opportunity to make improvements above and beyond the basic service. In the long term these could be used to ensure that environmental, health and safety, equalities and other standards are met.”

Better integrated transport network

74. The Scottish Association for Public Transport (23) believed that the proposed legislation would be an opportunity to develop an integrated public transport network with the following advantages:

- increased stability of bus routes and timetables
- better connections between bus services, and with rail services
- development of smartcard ticketing for travel on all Scottish public transport services
- better timetable publicity, and more real-time bus information.

75. Aberdeenshire Council (17) considered to achieve effective integration the proposal should allow for cross-authority franchise agreements.

Disadvantages

76. The main disadvantages of the proposals were identified as:

- cost of regulation
- difficulties for smaller bus companies
- restriction of competition.

Cost of regulation

77. A significant number of respondents, including local authorities, transport authorities and bus operators, expressed concern that additional costs of creating and managing the regulatory system would be onerous for local authorities if not mitigated by the detail of the legislation, and may be passed on to the taxpayer/bus-user.

78. Aberdeenshire Council (17) considered that improvement in bus transport through local authority control could only be achieved through potentially significant increases in public funding for bus services. The Council recognised that “Whilst there may be efficiency savings, for example associated with the removal of ‘wasteful on-the road competition’ on certain corridors, such savings will be negligible in rural areas such as Aberdeenshire and evidence from elsewhere such as London indicates that effective franchising requires high levels of public finance.”

79. Strathclyde Partnership for Transport (72) said—

“This reality of raising the baseline from "poor" to "satisfactory" – never mind "high" – could have significant cost to the public purse and more detail, analysis and clarity on the proposals is required to ensure the most effective model is chosen”.

80. Caithness Transport Forum (83) expressed serious concerns about potential costs to the taxpayer, citing the high levels of public expenditure of franchising bus services in London. Glasgow City Council (67) shared these concerns and suggested that “the franchising of individual routes ... may be more appropriate as an initial measure than the “bundling” of routes and enable the primary problem of evening and weekend services deficiencies to be tackled with less resistance from the incumbent operator”.

81. The two private bus operators who responded made the following comments—

“The main disadvantages are increased taxpayer cost, which would reduce funds available to deliver services to passengers, together with uncertainty for operators, employees and shareholders”. (Stagecoach (88))

“Greater regulation would result in a greater risk to Scottish tax payers and in reality place a much heavier burden on tax payers. The costs of introducing a franchise system not to mention the administration costs once implemented would be significant.” (First UK Bus (103))

82. NESTRANS (70) considered that cost and risk could be a “significant” barrier to local authorities in delivering local services and believed that franchise agreements should retain “some degree of operator flexibility and incentivisation.”

83. Stand Up for Our Buses (41) commented—

“There would still be little incentive to run unprofitable routes in rural areas where most routes are not commercially viable, so it would be difficult to arrange packages in a way which made them attractive to bid for. Meaningful improvements in rural bus services need proper funding;”

Difficulties for smaller bus companies

84. A number of respondents expressed concern that smaller bus operators could be disadvantaged as they may not have sufficient resources to apply to run larger franchised routes. The Community Transport Association (98), while supportive of the Bill proposals, believed that some operators could view their ability to generate a profit as having been “diluted to the extent that they may question whether they wish to continue in the industry”.

85. Tayside and Central Scotland Transport Partnership (73) expressed concern that there could be unintended consequences such as “potential market distortion within designated franchise areas (e.g. through loss of smaller operators who may not be able to tender for extensive networks) and between franchised and non-franchised areas (e.g. through the potential for predatory tendering by operators with a strong franchised core network in adjacent areas)”.

86. RELBUS (93) shared this concern but said small operators could deliver services through consortia and offer geographic efficiencies such as access to remote bus depots.

Restriction of competition

87. A number of respondents, including some local authorities, transport authorities, campaign groups and bus operators were concerned that franchising would restrict competition. The Association of Transport Coordinating Officers (ATCO) (77) commented that “Few bus operators in Scotland (or indeed the UK) are large enough to be able to operate any whole Council area franchises, significantly reducing competition”.

88. First UK Bus (103) pointed out that the “Competition Commission recently fully investigated and rejected greater regulation of the bus industry”, and that the “level of profitability of the Scottish bus industry currently fails to achieve the 10-12% margin levels outlined in the Competition Commission’s report”.

89. The Chairs of the Regional Transport Partnerships (105) and Strathclyde Partnership for Transport (72) had some concerns about the legalities of “cross-subsidising” bus routes.

90. Some bus operators were concerned that the proposals for re-regulation would threaten areas of service that are currently working well. Lothian Buses (62) pointed out that they are already providing a good bus service in the “deregulated regulatory regime” which is “highly cost-effective to the public purse”. Stagecoach (88) commented that they “can see no practical advantages of a return to a failed system of regulation, where local bus services are designed by local authority officers with no experience of serving passengers”. While First UK Bus (103) said—

“Passenger satisfaction within the industry is already high and investment is continuing apace. Re-regulation threatens that progress.”

Question 3: In what ways do you envisage re-regulation being used to improve bus services?

91. 78 respondents answered this question.

Potential benefits

92. The main benefits of re-regulation identified were:

- Ability to ensure a more equitable distribution of services between urban and rural communities by bundling and franchising routes
- Ability to set minimum standards of service in franchises
- Improved transparency
- Greater service integration (timetable co-ordination and integrated ticketing).

More equitable distribution of services by bundling and franchising routes

93. There was a high level of support for the idea of bundling profitable and non-profitable routes, including from local authorities, transport authorities, community councils and interest groups.

94. Clackmannanshire (9) and Stirling Councils (10) said—

“In the Clackmannanshire/Stirling Council area, we would envisage using the proposed powers to ensure a more equitable distribution of services between our urban and rural communities and to remove a number of network anomalies ... However, this would be dependent upon sufficient budgetary provision being available to meet aspirations. These powers are likely to be more useful to authorities whose area contains a mix of small urban and accessible rural areas than to authorities in densely-populated urban areas or island and remote rural areas.”

95. The majority of those supporting the measure believed it would help to secure acceptable levels of service to communities that are not well served by current arrangements, including those in rural communities, and assist with the provision of non-commercial, socially necessary services.

96. Many also believed that this would improve network stability and reliability of services. Scottish Association for Public Transport (23) considered that

Regional Transport Partnerships should be given responsibility for area franchises in to avoid the cross-border complexities arising from council areas.

97. A number of respondents believed that the measures would give local authorities the tools to address declining bus patronage in their area. Aberdeen City Council (16) said “we have seen bus patronage decline where frequencies have been reduced and this becomes a vicious cycle, whereby service level is reduced so patronage declines and as a result there is a continual drop in service provision. Areas where investment is made to bolster services and provide these at a high frequency often see considerable patronage growth and sustained patronage levels.”

98. Community Trade Union (63) expressed their support for the franchising proposal and commented that “We can’t continue to have a situation where private operators can cherry pick the most profitable routes and run down or simply cancel the less profitable routes ... Experience has taught us that publicly subsidising socially necessary bus services is woefully ineffective in safeguarding those services.”

99. However, a significant number of respondents believed there was a need for clarification of how the bundling of profitable and non-profitable routes would work in practice. Fife Council (36) considered bundling of profitable and unprofitable routes was a “positive step” but argued that it wasn’t actually necessary if the Minimum Level of Service/National Minimum Standards proposals were implemented.

100. SEStrans (32) suggested the most likely scenario would be an authority franchising services “in a relatively small corridor where services are deemed below minimum standards and/or where it has proved problematic to properly integrate tendered services with the commercial network in a cost efficient manner and where the public would clearly benefit from a fully integrated network.”

Ability to set minimum standards of service in franchises

101. The majority of respondents believed that the proposal to give local authorities powers to set standards of service would be beneficial. In addition to those of bundling of franchised routes discussed above, the main benefits in powers to set service standards were:

- Greater frequency of services where required
- Ability to specify essential bus services, such as direct routes to hospitals, to meet gaps in provision
- Ability to specify infrastructure required as part of the service, for example bus stop numbers and locations
- Ability to control bus fares
- Better vehicle quality
- Greater control over fares to improve social inclusion and encourage modal shift
- Improve use of and value for public spending on bus services
- Making it more difficult for bus companies to withdraw services

- Ability to ensure a standard of bus driver training to suit needs of passengers, for example in dealing with elderly or disabled passengers
- Ability to ensure student discounts are part of service level agreements.

102. Glasgow City Council Labour Group (79) commented—

“Rather than fares being set by companies, regulation would allow legal parameters to be enshrined in law to ensure that fares do not deviate too far from a pre-determined base level. Furthermore, future fare increases could be controlled to ensure that they can only increase in line with pre-determined levels, thus combating the phenomenon of inflation-busting fare increases at a time when the value of wages is stagnating.”

103. The Association of Transport Coordinating Officers (77) said—

“Assuming that appropriate funding was available, reregulation could be used to provide a more balanced service, delivered with a higher standard of vehicles and lower fares, all of which should combine to encourage modal shift and lead to an increase in bus use. It could ensure a more equitable distribution of services between urban and rural communities.”

Improved transparency and accountability

104. Many respondents cited greater transparency and accountability in the decision-making, monitoring and review of bus services as a key benefit.

105. A number of respondents believed the ability to share information on passenger loadings, which are denied to Councils currently due to commercial sensitivity, would allow better monitoring and decision-making on bus services.

106. Glasgow City Council Labour Group (79) felt that—

“By regulating the provision of bus services, operators are immediately subject to greater public accountability, through either the regional transport provider or local authority. Currently, principal accountability is to shareholders and a Board of Directors; thus there is a dearth of representation between service user and provider. Regulation would give voice to the wider public and enable its concerns to shape the future direction of bus travel.”

Greater service integration

107. A number of respondents called for the proposed powers to be used to improve integration of bus timetables across different areas, in order to ensure connecting services actually connect.

108. Some respondents also wanted to see bus services being integrated with other public transport services, and the integration of ticketing across regions and modes of transport. Benefits of this approach included the provision of a better, more cohesive, comprehensive transport service in rural areas in particular.

109. Rural East Lothian Bus Users (RELBUS) (93) said that integrated ticketing and timetables would lead to “seamless’ and more convenient journeys, especially as the aim of public policy is to increase passenger trips by bus, which would also help fund the improved services”.

110. Scottish Association for Public Transport (23) commented—

“Co-ordination of bus services on different routes, and with rail, and smartcard ticketing, would increase the attractiveness of public transport, particularly for journeys that involve changing between services. Smartcard ticketing should also reduce the time taken for fare collection, speeding up bus journeys. In rural areas, co-ordination between bus services, and development of regional bus/rail interchanges would improve both local travel and access to the national rail network for longer distance journeys.”

111. The National Federation of the Blind of the United Kingdom (20) called for a range of measures to improve the experience of blind people, including:

- The blind person’s Scotland-wide free travel concessionary scheme must be valid and accepted on all services.
- A Scotland-wide blind person’s companion concessionary travel scheme should be introduced without delay.
- Infrastructure should be updated to include improved lighting, shelters and information, including accurate 'Real Time' information at bus stops, automated audible on-board information announcements and accessible information.
- Legislation requiring disability awareness and equality training for all drivers and terminal staff.

112. The Scottish Council on Deafness (39) called for transport authorities to include clauses in tender/franchise documents that state that all drivers, inspectors and customer service personnel receive accredited disability awareness, deaf awareness and communication skills training as part of their induction into the company as well as on an annual basis.

113. Scottish Accessible Transport Alliance (64) said—

“The training of staff in disability awareness by operators is of prime importance, and should not be postponed. Some bus companies do this very well, others appear not to do it at all. Our members comment that people in powered wheelchairs are often refused access. Similarly, people with guide dogs can face problems of access. The installation of audio/visual next stop announcements systems has been shown to be of great assistance and encouragement to blind and deaf/blind users. We can add that the design of vehicles is not the only factor to consider regarding access: for instance the state of streets and the distance between bus stops can also determine their accessibility.”

Opposing views

114. Some respondents expressed concern that re-regulation would not bring benefits.

115. Bus operator Stagecoach (88) commented—

“There is already sufficient regulation to improve bus services. Aspects such as licensing, safety and punctuality are already strictly regulated. Where local authorities wish to improve local bus services current legislation provides for Statutory Quality Partnership schemes, which Stagecoach is happy to join. Where there is clear evidence of market failure current legislation provides for Quality Contract Schemes. No authority has sought to apply for a QCS so it cannot be said that they are onerous to achieve in appropriate circumstances.”

116. SWestrans (28) said that it “already exerts a reasonable level of control over local bus provision and quality, and additional powers to bundle routes may not provide improvement or sustainability to network design or provision.”

117. First UK Bus (103) commented—

“... rather than the introduction of a franchise system which is bureaucratic, expensive and damaging to the interests of passengers, operators and tax payers; fostering improved partnerships between bus operators and transport authorities is the key to better bus services.”

Question 4: How can community transport be better utilised to serve local communities and particularly low passenger volume routes?
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118. A total of 62 respondents answered this question.

119. The majority of responses stated that community transport was a valued resource. There was also support for community transport to play a greater role in the provision of bus services for local communities. However, a number of respondents raised issues which might impact on the extent to which community transport can be better utilised.

Current delivery of community transport

120. A number of Councils shared information about community transport services in their areas which ranged from car sharing to demand responsive transport operating under local or transport authority contracts. Clackmannanshire Council (9) and Stirling Council (10) emphasised that the type of community transport depended on a number of factors, such as geography, population density, availability of skills, willingness to engage in voluntary work and historical provision.

Benefits of community transport

121. The Community Transport Association (98) advised that good quality community transport services had been operating across Scotland over the past 10-15 years. The Association explained that “the cost base for a community

transport operator is lower than a commercial operator because there is a lighter touch regulatory regime”. The Association highlighted that—

“Community transport’s strength is its commitment to local communities. Services are rooted locally and form where local people decide to do something themselves about inadequate local transport rather than wait for others to solve their transport problems for them.”

122. It also pointed to examples where “community transport operators had kept services going against all odds which contrasts with large companies who withdraw services when the situation no longer suits them.”

123. Caithness Transport Forum (83) highlighted the benefits of community transport especially to remote areas, and in maintaining socially inclusive and accessible transport links and particularly as a “feeder” to commercial services. In this regard, the Forum pointed to the experience in Lincolnshire where—

“The Lincolnshire Interconnect service, which provides feeder services from rural areas and is subsidised by Lincolnshire County Council, was estimated in 2002 to have doubled ridership on conventional services – the equivalent of 180,000 passengers per year. (Department for Transport, 2003) More recently, the service was extended to taking passengers to stations on the Poacher Line, contributing to a 19.3% increase in passenger numbers on the line (Poacherline, 2008).”

124. Jayne Baxter MSP’s (92) response drew attention to the Scottish Parliament’s Infrastructure and Capital Investment Committee’s recent inquiry into community transport. She advised that these services “play a vital role in supporting health and well-being for residents and sustainable communities” by providing access to health, education, employment, social visiting or sport and leisure opportunities. In addition, she believed that community transport also offered opportunities for volunteers to gain skills, confidence, and experience which could help them gain employment.

Community transport needs

Consultation with communities

125. One of the main themes raised by respondents was the lack of consultation with communities either during the planning of services or in relation to the continuing need for services. Comments included:

- that there should be a requirement to engage with, and listen to, the community (Sense Scotland (21))
- that the community should be involved at an early stage and throughout the process (Community Trade Union (63) and Unison (104))

126. Respondents provided examples where consultation could benefit communities, including:

- buses not running on Sundays to allow people to get to religious services before the traditional 11am start time (individual (47))

- buses should be less expensive, feel safer, have more space for bikes and scooters, and be more frequent (Cowdenbeath Youth Forum (65))
- students in urban areas may need to frequent off-peak and night services, while in rural areas an increase in service from one bus a day to two may be necessary. (NUS Scotland (87))

127. Elaine Smith MSP (91) drew attention to the effect withdrawal of a bus service can have on particular groups of people within a community—

“First Bus have removed important services in Bargeddie meaning those travelling to Glasgow’s Royal Infirmary would have to get three buses. This undoubtedly makes it more difficult for those in need of medical care, particularly elderly and disabled people.”

Rural communities

128. A particular focus for comment was the provision of rural bus services. Katy Clark MP (57) said—

“Community transport is vitally important to groups, who are often vulnerable, who are isolated by regular transport services. I represent a constituency with two islands and services such as *SPT’s My Bus* deliver a vital service to many of my constituents.”

129. Other comments included—

“Parts of Clydesdale have been deemed “too rural” by SPT for the My Bus Rural service to operate in them. This leaves them completely inaccessible to non-car drivers.” (Stand Up for Our Buses (41))

“Similarly on Skye a transport initiative, whereby if a person lived within 20 miles of Portree a bus would pick them up and take them into the town, was also a valued service. The geography of the island, however, meant that it was very expensive to run and as a result it “folded”.” (Scottish Women’s Convention (102))

Night bus service provision

130. Another area which caused some concern was the lack of night bus services. Dennistoun Community Council (11) said, “It’s no longer the case that almost everyone finishes their day at 5.30, so why should it be acceptable that services end at 6.30”. NUS Scotland (87) provided a specific example—

“Student timetables do not typically follow the pattern of a normal working week. This is especially the case at exam time, when students may need to stay in the library until the early hours of the morning and still require a safe, reliable way to get home.”

Future provision of community transport

131. Caithness Transport Forum (83) drew attention to the potential issue of Scotland’s ageing population and the likelihood that this will further increase pressure on community transport, particularly patient transport.

Potential barriers to better utilisation of community transport

132. Some who responded to this question highlighted barriers which they considered might impact on the further utilisation of community transport:

- Need for greater funding
- Need for greater co-ordination of community transport services
- Clarity required on operation of community transport in franchise areas
- Possible legal difficulties

Funding

133. One of the main issues raised in this regard was that of funding. Glasgow City Council (67) suggested—

“Where a community transport service takes over the evening or weekend service remit of a single or multiple commercial daytime service(s), a mechanism to draw down funding support for the local operators could address the local transport authority funding issues.”

134. Aberdeen City Council (16) advised that “recent changes to the licensing regulations in this area has made it easier for providers to introduce/operate such transport, but the cost factor remains the biggest barrier and lack of funding makes it difficult for groups ... to provide DRT [Demand Responsive Transport] and CT [Community Transport] services”.

135. Sense Scotland (21) commented—

“Representations made by community transport to Scottish Government about their direct grants being passed to local authorities to disburse to them, went unheeded. The result has been for many community schemes a frustrating process of grant applications in response to which decisions seem to be made on an ad hoc basis.”

136. Other comments which called for better funding arrangements included:

- a funding model that ensures efficient delivery of services compared to a conventional bus service. (The Association of Transport Coordinating Officers (ATCO) (77) and Falkirk Council (78))
- problems with rail franchises indicate there has to be an efficiently funded alternative able to replace withdrawn or failed franchise bundles at short notice. (Dennistoun Community Council (11))
- Community Transport can be seen as a way to deliver services more cheaply. The Scottish Government should commit to helping the Third Sector by having a clear strategy and adequate funding. (Annandale Transport Initiative (ATI) (34))

137. Orkney Islands Council (100) stated that—

“Although a Service Level Agreement (SLA) is in place between the operator and the Council, the local authority has little control over the service operated. The grant funding can therefore be used in effect to

operate a reduced service should operating costs increase year on year. There is also little incentive to make the service operate more effectively than it does at present as there is often a mindset that the local authority will just hand out more funds to such services.”

Need for greater co-ordination of community transport services

138. Transport Partnerships called for greater co-ordination of community transport services. Views included:

- Such services should be developed in a manner which is effective, co-ordinated, and has appropriate governance, safety, training and quality standards in place. (Tayside and Central Scotland Transport Partnership (73) and the Society of Chief Officers of Transport in Scotland (81))
- The West of Scotland Community Transport Network (WoSCTN) model was cited as best practice by Strathclyde Partnership for Transport (72) and The Chairs of the Regional Transport Partnership (105)

139. There were, however, varying views as to which body was best placed to carry out this co-ordination role.

140. Caithness Transport Forum (83) thought the Scottish Government was best placed to work with local authorities, private sector transport operators and the voluntary sector to clarify best practice and encourage joint working where appropriate.

141. Others felt that Regional Transport Partnerships (RPTs) should play the main role. The Scottish Association for Public Transport (23) said they could develop area transport strategies which could identify opportunities for community transport. Stagecoach (88) suggested RPTs identify gaps in conventional bus service networks and determine whether there is sufficient demand to justify alternatives.

142. Rural East Lothian Bus Users (93) believed co-ordination by local authorities would support new initiatives, establish community transport networks, act as a central point of contact for users and ensure integration with other public transport provision. Ian Bieniowski (80) considered community transport should be planned and managed at local level, not through national transport strategies as this was too generic to be effective.

143. Another suggestion was made by Jayne Baxter MSP (92). She thought Community Planning Partnerships would be the best way of co-ordinating expensive resources such as vehicles and drivers.

144. Other points in relation to co-ordination of community transport were also raised. East Lothian Council (56) suggested “a mapping exercise across all local authorities ... and then development of a system to best use the resource which officers think may well be currently under-utilised”. North Area Transport Association (106) considered that—

“Community Transport Providers would benefit from the expertise of the larger companies and the larger companies could benefit from the

specialised knowledge that CT has, including how best to provide for the more vulnerable groups such as the over 60s and those with disabilities.”

145. The Scottish Accessible Transport Alliance (SATA) (64) considered that—

“There will always be a boundary between CT which is owned and managed by voluntary organisations and transport owned/managed by private firms or the Council, but often the function and result is identical. Because the former will often have a bias to operating with specialised groups or individuals a total merger is neither effective nor practical, but there are ways in an integrated system where CT could be used more effectively.”

Community transport and franchise areas

146. Renfrewshire Council (60) was supportive of the proposal, believing it could relieve the financial and resource burden associated with the delivery of community transport and lead to a more streamlined delivery of services.

147. While Glasgow City Labour Group (79) strongly believed that “the difficulty of proving ‘market failure’ and the delay in waiting for private operators to declare that they are not interested in a route hinders the ability of community transport to provide much-needed services”. The Group said “regulation would bolster existing community transport powers and allow timeous intervention to provide services where required”.

148. South Lanarkshire Council (19) considered it important for community transport to operate within franchise areas but said “care would have to be taken to ensure that this form of transport does not detract, dilute the provision of any commercial or ‘franchised’ services”.

149. A few respondents (Aberdeenshire Council (17), Highland & Islands Transport Partnership (94) and North-East of Scotland Transport Partnership (70)) were unclear how the proposal would improve community transport.

150. First UK Bus (103) was not supportive of the proposal as it believed the current process of tendering for services labelled socially necessary “is transparent and competitive”.

Legal matters possibly affecting community transport

151. West Lothian Council (35) believed “the ability of community transport providers to contribute to an overall network of services is restricted by both bus operating legislation and community transport groups’ constitutions which often restrict the types of service that they can provide.”

152. This view was shared by Glasgow City Council Labour Group (79) which stated that this “effectively prevents local authority fleets from being used in the provision of community bus services” and advised that “some Council vehicles are redundant for up to 75% of the time, demonstrating huge inefficiency” and called for legislation to be amended.

153. Fife Council (36) also considered current legislation presented difficulties for increasing the use of community transport; the Council suggested changes to sections 19 and 22 of the Transport Act 1985 in order to encourage community services to run local bus services, but cautioned that it could have “an adverse effect on the community services they currently operate”.

Potential improvements to community transport

154. Many respondents offered suggestions as to how community transport could be better utilised, including:

- extending the National Concessionary Travel Scheme to community transport
- greater use of existing transport resources e.g. council fleets
- greater use of section 22 permits under the Transport Act 1985

Extension of National Concessionary Travel Scheme to community transport

155. There was some support for extending the National Concessionary Travel Scheme to community transport.

156. Rajnish Bhaskar (5) believed an extension of the scheme would “help provide a reliable income flow for community transport providers and help ensure those with specialist requirements are not isolated.” Sense Scotland (21) also considered community transport should be “passport into existing concessionary travel”. Patrick Harvie MSP said it was “possible that the additional revenue would allow providers to be more ambitious in the service they provide and that we could see new competitors bidding to win franchises.” (51) This view was shared by Cronberry, Logan and Lugar Community Council (42).

Greater use of existing transport resources

157. A number of responses highlighted opportunities to use existing transport resources for community transport using council fleets or all publicly owned vehicles in rural areas.

158. The City of Edinburgh Council Transport and Environment Committee (76) advised that the Council was currently reviewing its community transport arrangements, working with partners such as the NHS, and said “the vehicles used for these purposes are often specially adapted to the needs of their users, and may be unsuitable for more mainstream local service operation”.

159. It was noted by a few respondents that Post Office buses were no longer in use and that these had been well used and greatly valued. The Scottish Women’s Convention (102) explained the impact withdrawal of such a service had on one community—

“On Skye, for example, they allowed people to travel to parts of the island not accessible to public transport, as well as delivering shopping to people in more remote areas. Their removal had a detrimental impact on rural communities, with the decision being made without consultation or understanding of the consequences.”

Greater use of section 22 permits

160. The Community Transport Association (98) considered that section 22 services under the Transport Act 1985 were a “relatively unexploited option”. The Association explained that “these look like mainstream bus services, may run a scheduled route but are operated by community groups”. The Association advised that “the number of such community bus services has grown from almost zero prior to 2009 to up to 30 currently”.

Other suggested ways of improving community transport

161. Other changes suggested which might assist better utilisation of community transport were:

- funding should be ring-fenced
- smaller buses on low volume routes
- better information on bus times (not everyone has access to the internet)
- fare structures which are fair and affordable
- comfortable buses are more attractive to owners of comfortable cars
- more frequent service on low passenger volume routes would increase usage
- improving interconnectedness of the transport network

Question 5: Do you agree that the Traffic Commissioner should be able to impose greater financial penalties on operators who a) fail to meet the terms of the franchise or b) walk away from the franchise altogether?

162. 70 respondents answered this question.

163. The majority of these respondents, 52 (74%), agreed that the Traffic Commissioner should be able to impose greater penalties on operators. A small minority, nine (13%), disagreed. The remaining nine (13%) neither agreed nor disagreed.

Arguments in favour of additional powers for the Traffic Commissioner

164. Some of the arguments in favour included:

- Penalties act as an incentive to operators to encourage a better service, as well as a deterrent to under-pricing bids in order to win contracts.
- Greater financial penalties would increase reliability and long term sustainability of bus services.
- Prevention of “cherry-picking” routes in urban and suburban areas considered a good idea.

165. Dennistoun Community Council (11) suggested—

“Penalties ‘should have some bite’, perhaps with an escalating scale for specific repeated breaches of service”.

166. Similarly, if operators didn't meet the terms of the franchise or walked away, North Berwick Community Council (13) recommended the operator should meet the costs of re-tendering, stressing this should not be met from the public purse".

Defining penalties

167. A number of respondents recommended types of penalties and made comparisons with penalties applied to rail franchises:

- Fife Council (36) suggested "a ban on bidding for future franchises for a period of time, perhaps Scotland-wide as opposed to within the Authority area of the original default".
- Scottish Association for Public Transport (23) suggested, "debarring operators from future contracts for a period of time".
- Association of Transport Coordinating Officers (ATCO) (77) and Falkirk Council (78) both proposed franchise holders "should be required to provide a performance bond to discourage them from walking away from a franchise; the level of the bond could be a fixed percentage of the value of the franchise contract".

168. A couple of organisations cautioned that penalties should be proportionate to the circumstances:

- Stand up for Our Buses (41) suggested "restricting the number of operator discs or withdrawing permission to operate routes" although stressed the need to factor in all reasons for an operator walking away from a franchise as sometimes these were for "reasons beyond their control e.g. withdrawal of subsidy".
- West Lothian Council (35) shared this concern, highlighting the need to look at penalties applied "in the event of a series of small failures outside [an operator's] control".

The role of the Traffic Commissioner

169. Many supported the view that it should actually be the local authorities who impose penalties for non-compliance instead of the Traffic Commissioner. Highland & Islands Transport Partnership (HITRANS) (94) and Nestrans (70) said—

"Any franchise agreement would require a contract between the franchising authority and the operator with appropriate contractual elements to be included within it to account for such situations with appropriate penalties to ensure compliance. It may be appropriate for the Traffic Commissioner to have a role in the enforcement and arbitration, in the case of dispute, of agreements although this should not be the only means of redress available to the contracting authority who should be able to impose sanctions using the appropriate provisions within the contract".

170. Aberdeen City Council (16) agreed with this view while it noted the Traffic Commissioner should continue to have a role to play, "greater sanctions are not always the best option." The Council suggested franchise agreements should be

set up similar to those already in place where the Local Authority has a contract in place with the operator.

171. Glasgow City Council Labour Group (79) also felt there was “scope for this power to be devolved from the Traffic Commissioner and passed to local authorities”.

172. A number of transport authorities said there was a need to look more closely at the role of the Traffic Commissioner to determine its scope of powers in conjunction with the proposal.

Resource implications

173. Some respondents suggested that the Traffic Commissioner needed appropriate resources to successfully fulfil the role envisaged. Tayside and Central Scotland Transport Partnership (73) highlighted examples of—

“RTPs assisting the Traffic Commissioner in monitoring bus service compliance and there would be merit in this model being further expanded provided appropriate resources were in place to support this”.

174. The Partnership also recommended that where financial penalties are imposed, “at least a proportion of these should be returned to the transport authority”.

Arguments against additional powers for the Traffic Commissioner

Contract provision

175. Other public sector and private sector organisation were unequivocal that the current practice of penalties being built into a contract should continue.

176. Lothian Buses (62) said—

“If there is a need to recover costs from an operator which withdraws from a contract the place for any such mechanism lies in the terms of the contract, not through some additional bureaucratic invention”.

177. Supporting their argument, they cited an example of a refuse collection service withdrawing from their contract—

“... any penalty for doing so would be expected to be built into the contract, it would not fall to a separate refuse collection regulator to levy any penalty”.

178. Stagecoach (88) confirmed—

“It is not uncommon for local bus service tenders to include a provision that a contractor seeking to terminate the contract prematurely shall pay the difference between the current and the retendered contract price”.

179. First UK Bus (103) supported this view, and also added that “the Traffic Commissioner’s role would revert to one of safety regulation”.

180. Other arguments against this aspect of the proposal included:

- increasing penalties won't be effective if there's no monitoring of compliance
- different means of legal redress should be investigated
- it would discourage entry into the market
- more analysis and detail needed
- financial penalties will be passed on as increased fares.

Question 6: What is your assessment of the likely financial implications of the proposed Bill to you or your organisation? What other significant financial implications are likely to arise?

181. 66 respondents answered this question.

Implications to organisation

182. The majority noted the proposal would have an increased financial impact on their organisation.

183. Six respondents specified there would be 'no' implications to themselves or their organisation.

184. Concerns about the financial implications included:

- increase in costs to transport authorities for infrastructure and monitoring of services
- greater investment required from all parties, e.g. Scottish Government, councils, regional transport partnerships and bus operators
- additional cost in fighting legal challenges
- funding could be re-directed from community transport
- public could see fare increases as costs passed on.

Extra resources needed for infrastructure, monitoring etc.

185. A number of respondents noted that extra resources would be needed to implement the proposal:

- East Lothian Council (56) pointed out that, "... to fill any gaps in provision, we would expect to have to buy more vehicles and to equip our vehicles (and staff) with the capacity to handle cash".
- To make bus services more appealing, improvements would be needed to existing resources such as bus shelters, real time information, bus lanes and bus priority measures. (The Association of Transport Coordinating Officers ATCO (77)
- If the minimum levels were to be upheld, monitoring and management staff would be needed (individual (5), Patrick Harvie MSP (51) and Cronberry, Logan and Lugar Community Council (42)).

186. Falkirk Council (78) was concerned “the franchising process may limit the viability of the non-successful operators, which would reduce competition when the franchise was renewed therefore potentially increasing costs”—

“Falkirk Bus Station is currently owned and operated by First. If First were not successful with a bid for a Falkirk area franchise and withdrew from the area, the future of Falkirk Bus Station would be in doubt”.

Greater investment required

187. A majority of the respondents acknowledged it would cost more to provide higher quality and more frequent bus services, with potential financial implications for bus operators, transport authorities, and the Scottish Government.

188. Public sector organisations advised they would not be able to meet additional costs from existing budgets. Aberdeen City Council (16) and Aberdeenshire Council (17) suggested that support should be provided by the Scottish Government. Likewise, Chairs of the Regional Transport Partnerships (105) said—

“A franchised model of service delivery is likely to generate significant additional costs, which could not be accommodated within current Local Government financial resources unless additional Central Government funding is provided, which is considered unlikely in the current public sector funding environment”.

189. Alternatively, Clackmannanshire Council (9) and Stirling Council (10) suggested extra costs should be balanced against the benefits, and said costs could be “met by reducing or rebalancing commitments across other areas of capital and revenue transport spending, such as road maintenance or construction or concessionary fares”.

190. The Scottish Association for Public Transport (23) recommended that “Changes to the financial framework for the bus industry should be considered along with the re-regulation proposals” and suggested that the Concessionary Scheme and Bus Service Operator Grant should be reviewed”.

Comparisons to London franchising model

191. Many respondents referred to the London franchising model described in the consultation. Glasgow City Council (67) said “A mechanism to extract funding from profitable routes could ease the burden but would no doubt be challenged by the operators”.

192. Some argued that adopting a London franchising model would incur significant costs: Chairs of the Regional Transport Partnerships (105) said “London costs were at a level that Scottish transport authorities could not sustain”.

193. Nestrans (70) pointed out that the London system highlights a key issue which is lack of funding both at a national and local level for provision of bus networks.

194. Fife Council (36) acknowledged the benefits of the London franchise and suggested that more funding was needed to achieve that success and that local authorities and the Scottish Government need to work together on the issue.

Costs associated with potential legal challenges

195. Respondents highlighted the potential for legal challenges from those impacted negatively by franchises. The Society of Chief Officers of Transport in Scotland (SCOTS) (81) pointed out these costs could be “significant”. First UK Bus (103) said they “... would likely be subject to a lengthy and expensive test in the European Courts”.

Impact on community funding

196. There was concern that in order to fund the proposal, resources would be directed away from community organisations. Fernhill Senior Citizens (33) said “It would be unfair if funding for community based organisations ‘suffered’ as a result of public funds being directed elsewhere”.

197. Caithness Transport Forum (83) was concerned that “increased expenditure on supporting franchised services is likely to have a “trickle-down” effect, reducing available funding for local authorities and thus organisations such as ours, which are partly or wholly reliant on local authority support”.

198. Some respondents indicated greater detail and analysis was needed before fully determining the financial implications, including some local authorities and regional transport partnerships, the Society of Chief Officers of Transport in Scotland (SCOTS) (81) and Chairs of the Regional Transport Partnerships (105).

199. Supportive comments included:

- it could make a large contribution to the finances of UNISON members if they could use public transport to and from work instead of using a car. (UNISON (104))
- Scottish Association for Public Transport (23) pointed out that cross subsidies between profitable and unprofitable routes, bundled within an area franchise, could reduce the need for public subsidy for the unprofitable routes.

200. Sense of Scotland (21) explained that the—

“Opportunity costs lost in not doing this include less access to quality of life and associated health costs, costs of not being able to attend work in shift patterns because of artificial ‘transport inflicted curfews’, isolation of communities most of which have low incidence car ownership and so no alternative to public transport”.

201. Mark Gallagher (1) acknowledged that “We can’t expect a good service on the cheap and a well-funded, regulated bus service would bring broader economic benefits to local communities”. Eight others made the same point FC Lees (2), David MacKinnon (7), Sonja Kennington(18), Christopher Lavelle (44), Stuart Roney (45), Emma Macphail (48), Yvonne McLellan (53), Marlies Pfeifer (55).

Question 7: Is the proposed Bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication, how might this be minimised or avoided?

202. 67 respondents answered this question.

203. The majority of respondents highlighted positive implications for equality in terms of geographic accessibility and social inclusion.

Geographic accessibility

204. University of Strathclyde Students Association (27) said—

“Therefore ensuring that socially useful services are provided will help to guarantee that our university remains geographically accessible to everyone. This plays a crucial and practical role in widening access to the university across social class boundaries, as well as geographic ones.”.

205. According to Katy Clark MP (57)—

“It is likely to have a positive impact on equality by ensuring that good quality bus services are not only available to those in urban areas (particularly cities) but also those in rural areas. Bundled routes should bring some equity between the standard of services delivered to different communities”.

206. Orkney Islands Council (100) said—

“Control over services, particularly to promote social inclusion in rural areas, would be positive in regards to equality in that local authorities would be aiming to improve these services and make them more accessible. Control over the frequency of services, the type of vehicle used and the fare rate set would all be beneficial and support those who do not have access to a car”.

Social inclusion

207. Some public sector organisations (Chairs of the Regional Transport Partnerships (105), Society of Chief Officers of Transport in Scotland (SCOTS) (81), Strathclyde Partnership for Transport (SPT) (72) and Tayside and Central Scotland Transport Partnership (73)) suggested that—

“A more effective regulatory regime would undoubtedly deliver a more comprehensive, integrated, and socially responsible bus network which in turn could only benefit all equality groups and excluded communities.”

208. One individual (43) pointed out that—

“As most people without transport are either those on lower incomes, the elderly, the young, those with disabilities, students and vulnerable citizens, that an improved bus network would “drive real inclusion.”

209. Jayne Baxter MSP (92) highlighted a report published by the Poverty Alliance and carried out by Fife Gingerbread which summarised the transport challenges facing single parents, often low-paid women, in rural areas—

“Transport serves as an enabler for people living on low incomes to access for example employment, shops and services. As such the impact of transport costs within household budgets will be critical for lone parent families in rural areas ... evidence shows that specific groups such as lone parents are less likely to own a car, further increasing the pressures on them.”

Disability

210. RNIB Scotland (101) highlighted problems encountered by blind and partially-sighted people have in using bus services and said “We call on all service providers to address the access barriers presented in the “Stop for me, speak to me” campaign report ... and remind them that people with sight loss have a legal right to use bus services. Many people struggle to read bus numbers, timetables and signs, but too often the way the bus service is run makes “seeing” an essential ability for using it.”

211. National Federation of the Blind of the United Kingdom (NFBUK) (20) believed the proposed legislation would “have positive implications for the equality of blind, deaf-blind and partially sighted travellers in Scotland” and suggested a range of measures to improve the experience of blind people:

- The blind person’s Scotland-wide free travel concessionary scheme must be valid and accepted on all services.
- A Scotland-wide blind person’s companion concessionary travel scheme should be introduced without delay.
- Infrastructure should be updated to include improved lighting, shelters and information, including accurate 'Real Time' information at bus stops, automated audible on-board information announcements and accessible information.
- Legislation requiring disability awareness and equality training for all drivers and terminal staff.

212. Scottish Council on Deafness (39) also pointed out that because—

“RealTime information is verbal, it is of no use to Deaf BSL users, Deafblind people and Deafened people who require accurate rolling script at bus stops and on buses, as well as drivers and inspectors who are

deaf aware and have the necessary communication skills to be able to treat deaf passengers properly”.

213. Scottish Accessible Transport Alliance (SATA) (64) also believed the proposal would enable opportunities for disabled people to enter the workforce and sustain employment, and agreed that disability training should be made a priority:

“Our members comment that people in powered wheelchairs are often refused access. Similarly, people with Guide dogs can face problems of access. The installation of audio/visual next stop announcements systems has been shown to be of great assistance and encouragement to blind and Deaf/Blind users.”

214. Patrick Harvie MSP (51) said that staff awareness and training on differing passengers’ needs, and effective policies for dealing with anti-social behaviour, were needed.

Age

215. Caithness Transport Forum (83) highlighted the importance of access to transport for young people for education, employment and training opportunities, pointing out that the three youngest age groups make more trips by bus than any other age group, except those over 60.

216. The Scottish Youth Parliament (SYP) (82) suggested that—

“The measures ... will provide equality for young people who do not drive, particularly those under 17 who are not allowed to.”

217. Some respondents pointed out that if a franchising approach was pursued, an equality impact assessment would need to be undertaken as part of the franchising process and mitigating actions taken if any negative impacts were identified. Scottish Accessible Transport Alliance (SATA) (64) suggested “disabled people must be consulted and involved in the making of this assessment.”

218. Respondents also identified negative implications—

- If small operators are forced out of business, this could result in job losses within the community.
- service levels are dependent on adequate funding which, if not sufficient, could have negative implications for equality. Stagecoach (88) commented—

“Unless there is a significant increase in public expenditure to accompany the proposed Bill, there will be an increase in public sector administration and bureaucracy costs and consequently less funds available to deliver bus services. The result would be a reduction in services or increase in fares or combination of both. Any of these outcomes will disproportionately affect the less well

off, young people and elderly people who form the majority of bus passengers”.

219. Sense Scotland (21) raised concerns that the proposal didn't explicitly advance the needs of disabled people, saying that any assumption that the Disability Discrimination Act would deal with these without specific measures to spell out how, will lead to little or no improvement for disabled people. The organisation was concerned that—

“Under the provisions of the bill therefore, on profitable services higher fares are imposed to cover the losses of the socially necessary routes which are bundled with this. Given high usage in lower income groups, this 'burden' falls disproportionately higher on these groups. Hence it is the lower income groups that are paying more for these socially necessary services, whilst the higher income groups, usually car owners, pay nothing”.

220. Although Sense Scotland thought there may be ways of mitigating the impact by providing concessionary rates to those on the lower rate of the Disability Living Allowance as many people in receipt had learning disabilities, physical impairment etc. which made travel difficult.

Question 8: Do you have any other comment that is relevant to the need for or detail of this Bill?

221. 78 respondents answered this question.

222. A number of respondents gave comments in response to this question that have already been covered in previous sections. Therefore only additional comments and suggestions are included here.

223. Clackmannanshire Council (9) and Stirling Council (10) gave the following reason as to why deregulation has not worked in some areas—

“(1) No single organisation or partnership plans and controls the overall bus service network; (2) Competition law inhibits operators and local authorities from adopting a partnership approach, as opposed to a purchaser-supplier relationship; (3) The disjointed nature of the deregulated network can prevent adoption of the best solutions, as these are dependent upon the ability to plan the network as a whole. In particular, subsidised services are obliged to take long, meandering routes in order to link commercially unserved areas and avoid competition issues on the main corridors”.

224. Jonathan Cowie (26) suggested that opportunities for cross subsidy at local or network level may be limited and that some consideration may have to be given to a role for a centralised authority to run or assist with any tendering processes, with Transport Scotland being the obvious candidate for this function.

225. A lot of respondents suggested different ways of paying fares. These included—

- a single unified travel pass in Scotland similar to the London Oyster Card;
- use of smart card payments instead of transcards, enabling electronic payment through direct debit or some other means, thus removing the need to renew via travel centres;
- contactless payment using mobile phones and/or debit/credit cards for those without cash or smart cards – particularly useful for tourists; and
- payment schemes available in each locality, such as Lothian Buses’ “Ridacard”.

226. Aberdeen City Council (16) noted that—

“Changes in Bus Service Operators Grant and Concessionary Fare Reimbursement have affected operators’ ability to operate services to the same level, especially in areas where there is not a high market for local bus services”.

227. University of Strathclyde Students Association (27) recommended that for those on lower incomes, such as students, there should be “a requirement of minimum service to ensure discount fares are available without restrictions on, for example, times or zones”.

228. South East of Scotland Transport Partnership (SEStran) (32) noted concerns that the powers of the private sector bus operators will be affected should local authorities decide to make use of their new powers. They argued that—

“Local Authorities should be compelled to give reasons why they want to implement such measures (although this should not mean that they should have to demonstrate “market failure”) and that the incumbent operator(s) directly affected should have the right to contest such a decision through an appeal procedure that could perhaps involve the Traffic Commissioner. On the other hand, there should be a legal requirement on operators to provide relevant passenger and financial data to local authorities to assist in the preparation of a franchise. There will also be a need for close co-operation between Councils to ensure that a franchise in one authority will not have an adverse impact on services in a neighbouring council. There may also be benefits in joint franchising amongst neighbouring authorities. It would be expected that Regional Transport partnerships could have significant roles on these issues. Consideration will also have to be given to the ownership of certain privately owned assets such as bus stations (where relevant), should a large part of the network be franchised”.

229. Annandale Transport Initiative (34) would like the Scottish Government to create a scheme to support Capital Grant funding and investigate a national scheme to allow leasing of buses to be affordable.

230. Auchenshuggle Community Council (37) pointed out—

“The transport authority should not be expected to assist the bus company in the upgrade of buses; this should be part of their business plan. [We] suggest there is less of a subsidy for rail travel as a bus is, for the most part, much more accessible to the travelling public and with popular timetabling should become the main mode of transport”.

231. Taking into account the fact that the vast majority of public transport routes are cross-border (between local authority areas), East Lothian Council (56) recommended that the Regional Transport Partnerships must have a large part to play in the implementation of any proposal.

232. Lothian Buses (62) proposed two potential changes—

“(1) giving a Local Authority the power to establish its own publicly owned bus operating company, provided that any such company must operate commercially in the deregulated, competitive market; and (2) setting out a clearer definition of the test which Local Authorities must apply to establish market failure before a Quality Contract can be introduced, while recognising the imperative of retaining an obligation to do so before intervening. If changes are to be proposed it is essential that they are based on a clearly established, evidence base of deficiency in the present arrangements and it is equally essential that what is proposed can confidently be expected to result in improvement and secure best value. The present paper neither identifies clearly any deficiency nor is there any evidence to say that the proposals contained in it will lead to benefits to the consumer. Indeed, there is very strong reason to believe that as currently framed they could actually lead to serious consumer detriment”.

233. The City of Edinburgh Council, Transport and Environment Committee (76) suggested—

“The Bill would offer Local Authorities considerable power in establishing integrated public transport networks, and addressing issues of social inclusion, access to employment, education and leisure facilities. Clarity must also be provided on existing legislation, for example the Transport Act 1985 and the Competition Act 1998, both of which are UK legislation, and may require modification. Franchise funding might need to be ring-fenced to ensure that local authorities are able to afford the franchise for its duration”.

234. Some respondents indicated that the franchise period would need to be of sufficient length to make it commercially viable for operators to invest in vehicles, local authorities to invest in any required infrastructure and to attract operators from outside the area. In order to maximise competition, the franchising of local authority areas should be staggered.

235. Caithness Transport Forum (83) supported strong focus on supporting sustainable transport, including increased usage of public transport. They cited a recent UK Government survey which revealed that “39% of respondents would be willing to catch the bus for short journeys, rather than use the car. (Department for Transport, 2013)”.

236. Stagecoach (88) suggested—

“The proposed Bill had arisen through a couple of unfortunate incidents of instability in the local bus market, which are not typical throughout Scotland. The proposed Bill is therefore totally disproportionate to the issues. This instability has arisen through a combination of circumstances affecting all operators in Scotland and the UK – the worst recession in 80 years, rising operating costs, especially fuel, and reducing public expenditure in real terms on supported services, BSOG [Bus Service Operators’ Grant] and concession travel payments. The real issue is to restore stability of public expenditure which we acknowledge is difficult in the current economic circumstances”.

237. Aberdeen & Grampian Chamber of Commerce (96) suggested—

“Evidence should be provided to demonstrate that competition will not be discouraged if the Bill is implemented”.

SECTION 4: MEMBER'S COMMENTARY

Iain Gray MSP has provided the following commentary on the results of the consultation, as summarised in sections 1-3 above.

Firstly, I would like to thank those who have taken the time to respond to this consultation. The expertise and enthusiasm in the responses is vital to the debate on how to improve services, and I will continue to take all sides into account as the bill proceeds.

I am also very grateful to my office staff - Alan, Chris, and Pat - for their efforts in organising events and materials to promote the proposal.

In particular, I would like to pay tribute to my long-time researcher Simon McFadyen, who very sadly passed away earlier this year. As well as being a keen bus-enthusiast too, he was a good friend and colleague, and is much missed by all who knew him.

The responses to this consultation have been greatly encouraging, and strongly support pursuing the proposal further.

I have also taken into account the concerns outlined in responses, and amended the proposal with some of these in mind, which I will come to shortly.

However, these concerns do not contradict the need for the bill, which was recognised in almost all of the responses.

Put simply, privatised bus services have brought some improvements to buses and services, but the deregulated system is letting too many communities down and, as it stands, does not put people first.

This proposal therefore seeks to put that right by empowering authorities to improve services for people, whether they are passengers now, or would be if they had reliable and regular buses serving their community.

I believe that bus operators want to provide more and better services - they all told me so when I met several of them prior to drafting this consultation - but as private businesses they can only do so where it is profitable.

And as many respondents have alluded to, the current system is 'gamed'. In other words, it is a near monopoly in certain areas, working in the interests of operators, and there is little true competition that might provide a public benefit.

In rural and semi-rural areas, there is no competition for services at all, and they are left to be subsidised by local authorities.

My proposal therefore seeks to give greater control to authorities to treat the system as a network. The legislation for this is already in place in the form of Quality Contracts, but they have never been used. I intend that my final proposal will address this.

Quality Partnerships have also been discussed within these responses, but take-up has been slow and protracted.

As this is seen by all sides as a good solution to local transport problems, I am dismayed by how underused this legislation has been.

To rectify this, I want modifications made to existing legislation to ease the implementation of Quality Partnerships.

Smart-ticketing schemes were also referenced by many respondents as a potential benefit of a reregulated system and I strongly agree. Discussion regarding the implementation of such a scheme has been ongoing for some years, but its delay is a symptom of the weakness of deregulation.

This can easily be corrected to compel operators to participate in ticketing schemes introduced by the local transport authority, and this will be a feature of my final proposal.

Finally, the proposal within the consultation that the Transport Commissioner have increased powers to penalise operators who break contracts was well supported. But, considering the recommendations from all of the submissions, I am minded that this would be a more significant undertaking than the scope of a Members' bill.

However, I do intend to consider the powers of the Transport Commissioner in relation to the registration of services within my final proposal.

ANNEXE A: RESPONDENTS, NUMBERED AS RECEIVED

Response Number	Name of Organisation/Individual
1	Mark Gallagher
2	FC Lees
3	Betty Weir
4	Ellie Harrison
5	Rajnish Bhaskar
6	David Rankin
7	David MacKinnon
8	Anonymous
9	Clackmannanshire Council
10	Stirling Council
11	Dennistoun Community Council
12	Edward J Smeall
13	North Berwick Community Council
14	Mrs C Hayward
15	Inverclyde Council
16	Aberdeen City Council
17	Aberdeenshire Council
18	Sonja Kennington
19	South Lanarkshire Council
20	National Federation of the Blind of the United Kingdom (NFBUK)
21	Sense Scotland
22	Gordon Poole
23	Scottish Association for Public Transport
24	Douglas Miller
25	Harry L Barker
26	Jonathan Cowie
27	University of Strathclyde Students Association
28	South West of Scotland Transport Partnership (Swestrans)
29	Isabel Crinean
30	Anne Travers
31	Neil Mackenzie
32	South East of Scotland Transport Partnership (SEStran)
33	Fernhill Senior Citizens
34	Annandale Transport Initiative
35	West Lothian Council
36	Fife Council
37	Auchenshuggle Community Council
38	Jane Duffy
39	Scottish Council on Deafness
40	Victoria Pearson
41	Stand Up for Our Buses

42	Cronberry, Logan and Lugar Community Council
43	James Mackenzie
44	Christopher Lavelle
45	Stuart Roney
46	Equality and Human Rights Commission (EHRC)
47	Sybil Murray
48	Emma Macphail
49	Leslie Fleming
50	Joseph McDermott
51	Patrick Harvie MSP
52	Gillian Rankin
53	Yvonne McLellan
54	Andrew Stephen
55	Marlies Pfeifer
56	East Lothian Council
57	Katy Clark MP
58	Fife Elderly Forum
59	William Campbell and Milton Community Council
60	Renfrewshire Council
61	Richard Fearn
62	Lothian Buses
63	Community Trade Union
64	Scottish Accessible Transport Alliance (SATA)
65	Cowdenbeath Youth Forum
66	Dougie McKerrell
67	Glasgow City Council
68	Hannah Welsh
69	Neil Bibby MSP and Mary Fee MSP
70	Nestrans
71	John Tweedie
72	Strathclyde Partnership for Transport (SPT)
73	Tayside and Central Scotland Transport Partnership
74	Joan Murdoch
75	Unite Scotland
76	The City of Edinburgh Council, Transport and Environment Committee
77	The Association of Transport Coordinating Officers (ATCO)
78	Falkirk Council
79	Glasgow City Council Labour Group
80	Ian Bieniowski
81	Society of Chief Officers of Transport in Scotland (SCOTS)
82	Scottish Youth Parliament (SYP)
83	Caithness Transport Forum
84	Dr Rebekah Gronowski
85	Patrick Hanson
86	Bill Sim

87	NUS Scotland
88	Stagecoach
89	North Ayrshire Council Labour Group
90	Confederation of Passenger Transport Scotland (CPT)
91	Elaine Smith MSP
92	Jayne Baxter MSP
93	Rural East Lothian Bus Users (RELBUS)
94	Highland & Islands Transport Partnership (HITRANS)
95	Max Cairns
96	Aberdeen & Grampian Chamber of Commerce
97	Barry Turner
98	Community Transport Association
99	Humbie, East & West Saltoun and Bolton Community Council
100	Orkney Islands Council
101	RNIB Scotland
102	Scottish Women's Convention (SWC)
103	First UK Bus
104	Unison
105	Chairs of the Regional Transport Partnerships
106	North Area Transport Association (NATA)

ANNEXE B: RESPONDENTS, IN ALPHABETICAL ORDER

Response Number	Name of Organisation/Individual
1	Aberdeen & Grampian Chamber of Commerce
2	Aberdeen City Council
3	Aberdeenshire Council
4	Andrew Stephen
5	Annandale Transport Initiative
6	Anne Travers
7	Anonymous
8	Auchenshuggle Community Council
9	Barry Turner
10	Betty Weir
11	Bill Sim
12	Caithness Transport Forum
13	Chairs of the Regional Transport Partnerships
14	Christopher Lavelle
15	Clackmannanshire Council
16	Community Trade Union
17	Community Transport Association
18	Confederation of Passenger Transport Scotland (CPT)
19	Cowdenbeath Youth Forum
20	Cronberry, Logan and Lugar Community Council
21	David MacKinnon
22	David Rankin
23	Dennistoun Community Council
24	Dougie McKerrell
25	Douglas Miller
26	Dr Rebekah Gronowski
27	East Lothian Council
28	Edward J Smeall
29	Elaine Smith MSP
30	Ellie Harrison
31	Emma Macphail
32	Equality and Human Rights Commission (EHRC)
33	Falkirk Council
34	FC Lees
35	Fernhill Senior Citizens
36	Fife Council
37	Fife Elderly Forum
38	First UK Bus
39	Gillian Rankin
40	Glasgow City Council
41	Glasgow City Council Labour Group
42	Gordon Poole
43	Hannah Welsh
44	Harry L Barker

45	Highland & Islands Transport Partnership (HITRANS)
46	Humbie, East & West Saltoun and Bolton Community Council
47	Ian Bieniowski
48	Inverclyde Council
49	Isabel Crinean
50	James Mackenzie
51	Jane Duffy
52	Jayne Baxter MSP
53	Joan Murdoch
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55	Jonathan Cowie
56	Joseph McDermott
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63	Mrs C Hayward
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65	National Federation of the Blind of the United Kingdom (NFBUK)
66	Neil Bibby MSP and Mary Fee MSP
67	Neil Mackenzie
68	Nestrans
69	North Area Transport Association (NATA)
70	North Ayrshire Council Labour Group
71	North Berwick Community Council
72	NUS Scotland
73	Orkney Islands Council
74	Patrick Hanson
75	Patrick Harvie MSP
76	Rajnish Bhaskar
77	Renfrewshire Council
78	Richard Fearn
79	RNIB Scotland
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83	Scottish Council on Deafness
84	Scottish Women's Convention (SWC)
85	Scottish Youth Parliament (SYP)
86	Sense Scotland
87	Society of Chief Officers of Transport in Scotland (SCOTS)
88	Sonja Kennington
89	South East of Scotland Transport Partnership

	(SEStran)
90	South Lanarkshire Council
91	South West of Scotland Transport Partnership (Swestrans)
92	Stagecoach
93	Stand Up for Our Buses
94	Stirling Council
95	Strathclyde Partnership for Transport (SPT)
96	Stuart Roney
97	Sybil Murray
98	Tayside and Central Scotland Transport Partnership
99	The Association of Transport Coordinating Officers (ATCO)
100	The City of Edinburgh Council, Transport and Environment Committee
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102	Unite Scotland
103	University of Strathclyde Students Association
104	Victoria Pearson
105	West Lothian Council
106	William Campbell and Milton Community Council