

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **TRANSPORT (SCOTLAND) BILL**

#### **SUBMISSION FROM PERTH & KINROSS COUNCIL**

In general terms the objectives set out within the Bill are strongly supported. It is appreciated transport and the transport network are important components in a successful, sustainable Scotland.

#### **LOW EMISSION ZONES:**

The rationale for LEZ's is understood and supported where there is a genuine problem of pollution as a result of traffic volumes with general car traffic accepted as the principal factor. Perth & Kinross Council currently has two separate AQMA areas, covering Perth city and Crieff, and is carrying out ongoing work into alleviating some of the issues within the settlements. While the legislation will provide ultimately the framework to implement an LEZ it is hoped by the required threshold period of 2023 many of the air quality problems have been alleviated, at least to below the standards required.

It is of note the major transport infrastructure scheme currently being taken through the statutory processes for Perth, the Cross Tay Link Road, will remove significant levels of traffic from Perth city centre with the intention to constrain the traffic at that level for the future. The CTRLR is highly beneficial to particular 'hot spot' areas in the city. However, if there is a need for an LEZ scheme then the option exists to develop an appropriate solution which may be for a very limited part of the network.

It is also of note that improvements in overall engine performance in terms of emissions and the continual growth in the rise in numbers of electric vehicles will also naturally reduce harmful levels of pollutants. PKC will closely monitor the neighbouring LEZ scheme in Dundee and while it is appreciated this is at an early stage there may be synergies in terms of back office type operations including system compatibilities, enforcement and ongoing monitoring.

It is appreciated the four major urban areas in Scotland will be at the forefront of the LEZ schemes and there will be benefits for other authorities in learning from the cities. A point worth noting is that the demographics and geographical configuration of local authorities is very different. Perth has a significant rural hinterland with many trips into the city, either employment, education or business, coming from the surrounding areas. This peripherality factor will need careful assessment when implementing any type of LEZ.

#### **BUS SERVICES:** Comments from the Council's Public Transport Unit

##### Provision of local services by local authorities

This allows for provision of local bus services by local authorities where there is market failure. In terms of Perth and Kinross this is a power that would be worthy of investigation although it is appreciated it can only be implemented when certain

criteria are met. Although the financial requirements of such a proposal will require a full appraisal of a range of issues we would suggest that with the ongoing decrease in PSV operators in the rural areas of Perth and Kinross, this will be of interest as the vast majority of the local bus network outwith Perth is currently subsidised.

We would add that another area of concern that we have already highlighted is the decrease in taxi and private hire vehicles in the deep rural areas and this is an issue that as a Council we should consider sooner rather than later.

### Bus Services Improvement Partnerships

The provision of Bus Service Improvement Partnerships (BSIPs) is similar to the current Statutory Quality Partnerships (SQP) which were intended to improve services in a specified area. SQPs are relevant to commercially operated bus services (in an area or corridor) and as there are few of these within Perth and Kinross, an SQP has never been formed.

Due to the complexities of establishing SQPs these have rarely been formed in Scotland overall. The process for establishing a BSIP is also an in depth and lengthy process so it may be that this power is also unused. We consider due to the low level of commercial services in Perth and Kinross, this process would not be applicable

We would advocate continuing our ongoing close working relationship with the local bus operators and the implementation of a local transport strategy.

We would add that, around 12 years ago when the Bus Route Development Grant was available, the PTU were successful in securing funding and engaged in partnership working with Stagecoach to improve three corridors in Perth, namely those operated by Service 5/6, Service 7 and Service 9/10. This work involved improved infrastructure, implementation of bus lanes and new vehicles, so could be viewed as a local partnership working rather than a formal partnership. Therefore should a similar source of funding become available in the future this could be worthy of consideration.

### Local Services Franchises

Similarly, the provision of local service franchising is comparable to the current Statutory Quality Contract. This would be similar to the manner in which the rail franchise operates. The local authority would specify livery, level of service; fares etc. in a tender and the successful bidder would have the exclusive rights to service provision in the specified area.

No Quality Contract has been established anywhere in Scotland, therefore in order for franchising to be undertaken the process would need to be less bureaucratic. However, as with BSIPs, franchising is not considered a viable option for local bus services in Perth and Kinross due to the lack of wholly commercial services and the lack of competition.

### Information relating to services

When a bus operator wishes to vary or cancel a local bus service they are legally required to provide the local authority with 28 days' notice of the change/cancellation prior to then providing the Traffic Commissioner with 42 days' notice of the change.

In terms of commercial services, this 28 day consultation with the local authority often consists of the varied timetable or cancellation application being provided exactly 28 before it is due to be submitted to the Traffic Commissioner. The local authority then can be required to request passenger information, analyse this and then make a decision if they need to act on this by adjusting other tendered services or procuring to fill this gap. However, this legislation will require that this data is provided automatically at the start of the consultation process which will allow local authorities more time to make informed decisions.

### **Ticketing Arrangements and Schemes**

Smart ticketing was always going to happen regardless of legislation but this will now formalise this facility to be a Scotland-wide integrated scheme. The bus industry has been developing smart tickets for several years and the PTU implemented smart tickets for both Perth City Campus pupils and Perth College UHI students for whom we arrange transport.

Perth & Kinross Council's current Conditions of Contracts and General Specification for the Transport of Passengers include a specific clause in relation to smart ticketing as follows:

In respect of Local Bus Service and Local School Bus Service Contracts only, vehicles will be equipped with electronic ticket machines certified to the latest ITSO version required by Transport Scotland, with all such ticket machines being Smartcard, GPS tracking and Real Time Information (RTI) enabled.

The crux of this matter will be the statutory instrument which will require to detail the revenue sharing facility. This has thus far been a stumbling block for developing and agreeing a commercial multi-operator revenue sharing facility to allow one ticket travel Scotland wide.

### **PAVEMENT PARKING:**

The problems of inconsiderate parking are well understood particularly for those with mobility problems. For an area as geographically large and diverse as Perth & Kinross this section of the Bill has the potential to create significant resource implications. While a national blanket ban negates the need for the cumbersome TRO process there will still be cost and staff concerns with the new procedures required for exemptions.

The Council area consists of the main settlement of Perth, the burgh towns of Auchterarder, Kinross, Pitlochry, Blairgowrie and Crieff as well as other small towns including Aberfeldy, Scone, Luncarty, Bankfoot, Stanley as well as many other smaller villages and settlements. The point is the road network in the area is hugely diverse and dispersed. For the Council to review all the public roads in its area to

determine the need for exemptions to the Bill is a massive undertaking and at this time difficult to apportion a timeframe in which this could be carried out.

In relation to enforcement the very dispersed nature of the area again would make enforcement a complex task. Again it is difficult to comprehend what level of additional resources would be required to carry out effective enforcement but it will be again significant. The key point in this is, reluctantly, without effective enforcement the Bill will not deliver what it was provided to do, in reality it would be undermined.

There are a number of locations where 'pavement parking' is an accepted practice as, particularly in the older residential areas, the lack of space and the need to provide a clear passage for oncoming vehicles has made this the norm. There may be an issue should an exemption for a specific location not be implemented that traffic will by virtue of the blanket ban just move to other locations, perhaps neighbouring streets potentially creating other issues.

### **SCOTTISH ROAD WORKS COMMISSIONER**

Officers are supportive of any improved legislative measures that can make the carrying out of road works a more efficient process. The power to issue Compliance notices with enforcement consequences for those that fail can only be for the public benefit.

### **SMART TICKETING**

Legislation which helps provide a clear and consistent framework for ticketing across the various modes of travel is supported.

### **REGIONAL TRANSPORT PARTNERSHIPS**

The rationale for this change in legislation allowing the RTP's to deliver projects which will typically run beyond a single financial year is supported

### **SCOTTISH CANALS BOARD**

No comment to make on this issue as there are no canals within the council area.

