



## CONSULTATION RESPONSE FORM

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Company name or organisation (if applicable)	Bus Users Cymru
If you would like your response or personal details to be treated <b>confidentially</b> please explain why:	

<b>Question 1: for example - Do the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?</b>		<b>No</b>
<b>Answer 1:</b> <p>The description of a "Local Bus Service" was shown in paragraphs 5 to 12 in the Draft 2013 version but deleted in your 2014 Draft. As it was not in your existing document "Practice Direction: Standards For Local Bus Services Effective from: 1st January 2005", which your Guidance 14 seems to replace, this may be an understandable move.</p> <p>However, we liked the basic description and felt it did aid the reading of the document without having to re-read Acts of Parliament. If there is a change to the Act your guidance is likely to change anyway, so we see value in keeping this description.</p> <p>If from other consultees' responses, you were to restore paragraphs 5 to 12 from the Draft 2013 document into a new edition for 2014, there is one point we wish to highlight :</p> <p style="padding-left: 40px;">"8 A copy of the completed application and accompanying documents must also be sent to the relevant transport authority" - for Wales this must include: <b>"and in Wales to Traveline Cymru"</b>. We suspect all Traveline bodies across the UK should be notified too.</p>		

<b>Question 2: for example - Do any parts of the guidance and/or directions require clarification? If so, please refer to the paragraph number and explain why.</b>		<b>Yes</b>
<b>Answer 2:</b> <p>In the Draft 2014, the paragraph 6 shown below is misleading and also mixes bus stopping points that are a function of place; with frequency of the service (which is wrong) that is a function of time.</p> <p>"6 The operator is required to register stopping points on the route including recognised bus stops, which are signed and established unmarked stops. If there is always less than 10 minutes between stops this may be treated as a frequent service (paragraph 9 of the Schedule of the Public Service Vehicles (Registration of Local Services) Regulations 1986 and paragraph 10 of the Schedule of the PSV (Registration of Local Services) (Scotland) Regulations 2001)".</p>		

The first sentence reads oddly and is ambiguous. It should be re-worded, in our view as: “The operator is required to register stopping points on the route including recognised bus stops, which are signed and **those that are not, but are** established unmarked stops”.

There should also be a reference for giving the Traffic Commissioner a clear unambiguous description of what areas along any route where any “Hail & Ride” stopping arrangements might apply. Local authorities and the police have an interest in this for highway safety, let alone being a relevant description of how a bus service might be run by an operator.

The next sentence is a different subject, referring to frequency (time) of a Local Bus Service and should be a separate paragraph. It should be re-worded, in our view as: “If there is always ~~less than~~ **10 minutes or less** between ~~stops-buses in the timetable~~ this may be treated as a frequent service (paragraph 9 of the Schedule of the Public Service Vehicles (Registration of Local Services) Regulations 1986 and paragraph 10 of the Schedule of the PSV (Registration of Local Services) (Scotland) Regulations 2001)”.

In conclusion to paragraph 6 is more useful and pertinent if you restore a full explanation of what a Local Bus Service is by restoring paragraphs 5 to 12 in the Draft 2013, taking account of Bus Users Cymru comments to Question 1, above on this form.

**Question 3: for example - Are there any aspects of guidance and directions which, as drafted, should not be included? If so, please explain why.**

Yes

**Answer 3:**

On page 9, Window of Tolerance, you now propose expanding this window rather than as proposed tightening it in your 2013 Draft. As a body representing bus passengers Bus Users Cymru has strong reservations with the proposal to extend the current window from 1 minute early to 5 minutes late, to **‘1 minute early to 7 minutes late’**, on the following grounds:

- a. The current window is reasonably well understood by the public and 5 minutes is about as long as most people are prepared to stand without getting too agitated about a bus delay.
- b. For the elderly and infirm in inclement weather, at exposed bus stops, extending the allowable waiting period is unacceptable. Although they have to endure this on the occasions when, as the Traffic Commissioner says, there is a mechanical issue with the bus, there are traffic accidents or traffic congestion, accidents (potential crime scene). Traffic congestion or vehicle breakdown will last longer than an extra 2 minutes so extending the window from 5 to 7 minutes late is not acceptable for the reasons given.
- c. There is well documented evidence on the economic “Value of Time” used in transport schemes and infrastructure projects under cost benefit analysis. This highlights that a commuter’s time is worth a lot more than leisure time, and here again commuters wanting for a bus to get to work will not appreciate buses routinely being 7 minutes late with no effort to make it run in a more reliable window.
- d. Many bus services are being reduced in frequency in the provinces of the UK and especially in Wales. The majority of bus services in Wales now run on half hour or less frequently with many more becoming hourly or two-hourly. This will result in passengers waiting longer in the proposed window and to have the printed timetable being a variable guide of eight minutes (one minute early and seven minutes late) does not instil confidence in the passenger.
- e. Passengers need punctuality and increasing the window is not likely to deliver that.
- f. People are less tolerant of delay in the current age of instant living (microwave ovens instead of cookers; e-mail rather than post, etc). We were not happy with the abolishing of the window of tolerance but equally not happy with extending it.

Therefore, for the above reasons Bus Users Cymru objects to any change to the operating window of tolerance.

**In consequence:-**

In Paragraph 97 “ - for timetabled services 95% of buses will depart within the bracket of up to 1 minute early and up to 7 minutes late”. Bus Users Cymru **disagrees** with the 7 minutes late and wishes to see this maintained at the current 5 minutes late.

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<b>Question 4: for example - Are there other provisions not included in these guidance and directions that should be? If so, please explain what they are.</b>		<b>No</b>
<b>Answer 4:</b>		

<b>Question 5: for example - Are there aspects of these Guidance and Directions which seem likely to increase your financial or administrative burdens? If so please explain what they are and, if relevant, what changes would reduce the increase.</b>		<b>No</b>
<b>Answer 5:</b>		

Please send your completed form to: [sstcconsultations@otc.gsi.gov.uk](mailto:sstcconsultations@otc.gsi.gov.uk) or by post to:

Office of the Senior Traffic Commissioner  
Suite 6  
Stone Cross Place  
Stone Cross Lane North  
Golborne  
Warrington  
WA3 2SH

Please ensure that if you submit your response by post it is clearly marked for the attention of Corrina Bielby.

**The deadline for responses is: 19<sup>th</sup> May 2014**