

CONSULTATION RESPONSE FORM

CONSULTATION ON POSSIBLE CHANGES TO THE ADMINISTRATION OF CONCESSIONARY TRAVEL

PART 1 - Information about you

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Company Name or Organisation (if applicable)	Maidstone Borough Council
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input checked="" type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:	
If you would like your response or personal details to be treated confidentially please explain why:	

PART 2 - Your Comments

1. Are there other problems, stemming from current administrative arrangements, that are not covered by this list?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

There can be conflict between districts in area schemes, particularly when they wish to have different local concessions or they appear to be inequitably funded according to the actual use of passes in each district. With growing pressures on such costs there is a risk that area schemes will become increasingly difficult to maintain

2. Do you think that the current level of administration is the most appropriate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

It is better if districts can combine into an area scheme which brings economies of scale and enables specialist advice to be engaged. This becomes more difficult however as cost pressures increasingly become an issue and some districts no longer wish to continue on the same basis.

3. Do you think a system of 'higher-tier' administration would be the most appropriate?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

Yes, as this should make it easier for passengers and bus operators to understand and operate with fewer artificial boundaries. It is also likely to bring some cost saving, particularly in respect of the application process.

There must however be a requirement that the higher authority consult and obtain a majority decision from the districts before making scheme changes. In parallel districts must then retain an ability to operate other transport concession schemes under well being powers e.g. vouchers, should they consider that any such changes do not reasonably reflect local needs.

4. Do you think a centrally administered statutory minimum concession would be most appropriate at this time?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

Ideally no as it would remove the concession too far away from local control and restrict the ability to pursue any local needs and concerns. It is also, as stated in the consultation, likely to be unnecessarily cumbersome and costly to manage. If this option is proceeded with districts must retain a power to operate other transport concession schemes e.g. taxi vouchers (under well being powers) should they consider it necessary to meet local needs

5. Do you think a regional tier of administration might ultimately be most appropriate?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

No, as this would similarly remove the concession too far away from "local" control, to an authority with no effective engagement or understanding of local transport issues and providers.

6. Are there other options for administering the statutory minimum concession that are missing from this list?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

None that we can identify.

7. Should all local authorities retain the ability to establish discretionary travel concessions using powers under the 1985 Transport Act as now?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

The bus pass only caters for those who have bus services and are able to access them. It does not cater for those people who live in areas without bus services or for those who through mobility impairment are unable to access buses. It is essential therefore that such local discretions are retained.

8. Should the ability to establish discretionary travel concessions using powers under the 1985 Transport Act be limited to upper tier authorities only?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

No this risks local concerns being ignored and does not enable district councils to use their well being powers appropriately. See also answer to question 7 above.

9. Should lower tier authorities ability to establish discretionary travel concessions using powers under the 1985 Transport Act be limited to circumstances where they had to act jointly with upper tier authorities only?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: District councils must retain a freedom to introduce specific local concessions and discretions to enable them to react to specific local issues. See also answers to questions 7 and 8 above.		

10. Do you have any relevant data that could inform the cost/benefit estimates that will be used in the final Impact Assessment?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: No		

11. Bearing in mind that there would be a separate consultation on the funding implications of any changes to the administration of concessionary fares, are there any other issues around funding that are not considered here?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: There is a clear imbalance caused by disproportionate demand between neighbouring districts due to the location of key shopping and business centres and transport interchanges. In our case significant numbers of people from surrounding districts visit the town to shop or for business and we must fund all of these return journeys. We are also a key interchange point for bus services for those undertaking longer journeys within the county. In addition we are "fortunate" to have a high level of bus service provision in both the urban and rural areas. This leads to a much higher level of demand (and cost) than in many surrounding district areas. It is unrealistic to expect or assume that districts which belong to countywide schemes are paying all of their special grant funding into the scheme to the benefit of other districts. This is not the case. It is clear that many have received more special grant funding than the additional costs they are required to pay and have benefitted from this. This must be taken into account in the next stage of the consultation process. The funding situation has been exacerbated where appeals have been granted by the DfT, and no additional funding is provided to match this. Simply removing "current" expenditure on concessionary travel risks leaving many districts		

worse off than before it was introduced. When individual bus companies are to be left no worse off than before, why should districts be treated differently?

If you have any other general comment that you would like to make concerning this consultation, please give them here:

None