

CONSULTATION RESPONSE FORM

CONSULTATION ON POSSIBLE CHANGES TO THE ADMINISTRATION OF CONCESSIONARY TRAVEL

PART 1 - Information about you

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| Name | South Cambridgeshire District Council |
| Address | Cambourne Business Park, Cambourne, Cambridgeshire |
| Postcode | CB23 6EA |
| email | keith.miles@scambbs.gov.uk |
| Company Name or Organisation (if applicable) | N/A |
| 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: N/A | |
| If you would like your response or personal details to be treated confidentially please explain why: N/A | |

PART 2 - Your Comments

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| 1. Are there other problems, stemming from current administrative arrangements, that are not covered by this list? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>The problems with the current administrative arrangements are set out in section 6 of the consultation document, these include scheme variations across TCA boundaries, difficulty in accurately funding TCAs, TCA boundaries not aligned with Transport Authority boundaries and conflicts between TCAs and bus operators</p> <p>RESPONSE</p> <p>It is not yet clear whether the problems set out in the consultation document are teething problems with a new system which is just 1 year old or systemic problems which require fundamental changes to the system. Provided that the TCAs are fully reimbursed for the cost of concessionary fares and the administration costs of providing the service then the decision on which authorities should be TCAs can be determined on a balance between service to the public and administrative efficiency.</p> | | |

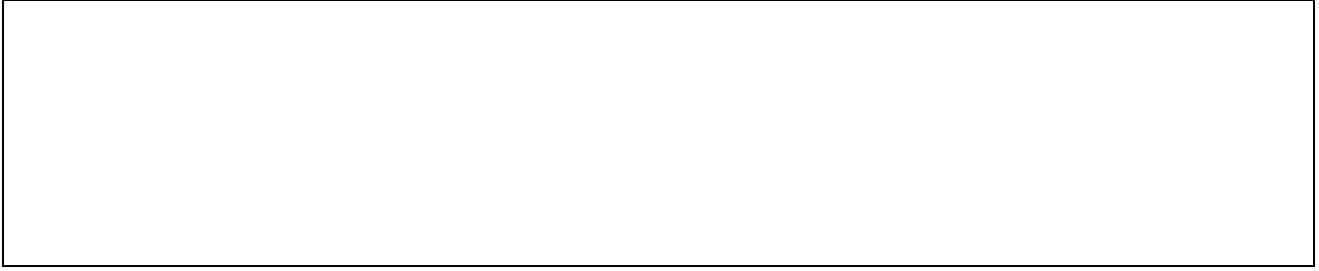
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| 2. Do you think that the current level of administration is the most appropriate? | Yes <input checked="" type="checkbox"/> | No <input checked="" type="checkbox"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>Under this option, South Cambridgeshire remain the TCA.</p> <p>RESPONSE</p> <p>It is not yet clear whether the problems set out in the consultation document are teething problems with a new system which is just 1 year old or systemic problems which require fundamental changes to the system. In Cambridgeshire a number of the problems identified in the consultation document have not arisen because the District Council's have acted in concert with the County Council to devise a countywide scheme. Provided that the TCAs are fully reimbursed for the cost of concessionary fares and the administration costs of providing the service then the decision on which authorities should be TCAs can be determined on a balance between service to the public and administrative efficiency.</p> <p>There are some minor advantages in the District Council continuing to administer the passes:</p> <ul style="list-style-type: none">· Application forms for concessionary passes are incorporated into South Cambridgeshire's Housing Benefit application forms making it simple for residents to claim both· Verification in these cases is minimised as residents supply documents just once to support both benefit and concessionary pass applications | | |

- The concessionary pass database is kept up to date by comparisons with other data bases, such as Council Tax, to reflect deaths etc.
- Staff are already experienced in verification processes

A draw back in terms of South Cambs is the lack of customer access points, which means the vast majority of our applications are dealt with via the post (this can also be seen as an advantage as residents can apply from the homes). It is possible that a move to County level would allow more access points. eg libraries.

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| 3. Do you think a system of 'higher-tier' administration would be the most appropriate? | YES <input checked="" type="checkbox"/> | NO <input checked="" type="checkbox"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>Under this option only upper tier authorities would administer the concession, i.e. Cambridgeshire County Council.</p> <p>RESPONSE</p> <p>The joint arrangements in Cambridgeshire with the District and County Council acting in concert makes the case for transfer to higher tier authorities less compelling. As previously advised, the problems raised in the consultation document may just be teething problems. Even the funding issues can be resolved with the benefit of experience of the new system.</p> | | |

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| 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"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>Under this option, Government would take the responsibility of scheme administration across England. Many of the problems whether teething or otherwise would be overcome and some administrative efficiencies may be found. It would however require a two level administration where local authorities administer additional discretionary concessions whilst the Government administered the national scheme.</p> <p>RESPONSE</p> <p>On face value a national concessionary fares scheme could be administered by the Government in much the same way as Car Tax is administered efficiently by DVLA. Problems could however arise where local authorities wanted to opt to use their discretionary powers to offer additional concessions making the scheme complicated for the bus operators and confusing for the public.</p> | | |



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| 5. Do you think a regional tier of administration might ultimately be most appropriate? | YES <input type="checkbox"/> | NO <input checked="" type="checkbox"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>There is no such regional tier of Government for most of England outside London.</p> <p>RESPONSE</p> <p>No such regional tier of Government exists or is proposed. Problems would in any event arise where local authorities wanted to opt to use their discretionary powers to offer additional concessions.</p> | | |

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| 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"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> | | |

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| 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"/> |
| <p>Please explain your reasons and add any additional comments you wish to make:</p> <p>OPTION</p> <p>This option would continue the current situation and would retain the powers under the 1985 Transport Act for District Councils to maintain and introduce concessionary travel concessions.</p> <p>RESPONSE</p> <p>This option is favoured as it would allow District Councils to provide discretionary travel concessions in response to local needs which will vary for example between urban and rural authorities and between parts of a local authority area e.g. in many rural areas the only outward bound bus runs before 9.30am. There are insufficient safeguards for the continuation of local discretionary travel concessions if this responsibility were moved to rest with a higher tier of government, which will inevitably be more remote. This may complicate the calculation of how much funding to transfer between local government tiers. How this can be achieved equitably is a matter for the further proposed consultation</p> | | |

on scheme funding.

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| 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:

OPTION

Upper tier authorities currently already have these powers

RESPONSE

This option is not supported, it would put at risk District level discretionary travel concessions. There can be no guarantee that a higher tier authority would provide differential local concessions as there would be pressure to have a common standard across the higher tier authority area. A lower tier district authority is unlikely provide funding to the higher tier authority to introduce a new or continue to existing discretionary concession if funding has been redirected to the higher-tier authority.

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| <p>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?</p> | <p>YES <input type="checkbox"/></p> | <p>NO <input checked="" type="checkbox"/></p> |
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Please explain your reasons and add any additional comments you wish to make:

OPTION

This option would see the formal responsibility for reimbursement for discretionary concessions moving to the upper-tier authorities, but allowing lower-tier authorities to implement discretionary concessions with the agreement of the upper tier authority.

RESPONSE

Not supported. A District Council is often best placed to know what local discretionary travel concessions are needed and should retain the ability to implement these without needing the agreement of the higher-tier authority.

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

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| <p>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?</p> | <p>YES <input checked="" type="checkbox"/></p> | <p>NO <input type="checkbox"/></p> |
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Please explain your reasons and add any additional comments you wish to make:

Whether or not the administration arrangements for concessionary fares are changed, it is critical that no TCA should be underfunded by central for the costs of providing a national scheme of concessions for travel on public transport. Government should use the experience of the early years of the scheme to fine tune grant allocations to TCAs.

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

No additional comments