

ANGUS COUNCIL**PLANNING AND TRANSPORT POLICY COMMITTEE**

25 April 1996

SUBJECT: PUBLIC TRANSPORT POLICY STATEMENT**REPORT BY DIRECTOR OF PLANNING, TRANSPORT & ECONOMIC DEVELOPMENT**

Abstract: This report informs Committee of the results of consultation with public transport operators and neighbouring authorities in respect of Angus Council's Draft Public Transport Policy Statement.

1 RECOMMENDATION

It is recommended that the Committee -

- 1 Agree the changes to the draft policy statement, as outlined in this report and incorporated in the document attached to this report.
- 2 Agree to the publication of the amended document as Angus Council's Public Transport Policy Statement.

2 INTRODUCTION

- 2.1 At its meeting on 17 January 1996 this Committee agreed the policies outlined in the Draft Public Transport Policy Statement as a basis for consultation (Report AC 1/96). The Transport Act 1985 requires that these policies are published and for consultation to take place on these with local bus service operators and neighbouring authorities.
- 2.2 The consultation process is now complete and this report informs Committee of the results of this consultation exercise.

3 RESPONSES TO CONSULTATION ON THE DRAFT PUBLIC TRANSPORT POLICY STATEMENT

- 3.1 Copies of the Draft Public Transport Policy Statement were circulated to all local bus service operators currently providing bus services in the Angus area and also to the adjoining councils namely Dundee City Council, The Aberdeenshire Council and Perth and Kinross Council. There were only three formal responses to the Statement.
- 3.2 The Draft Public Transport Policy Statement was well received and there were few requests for the policies to be amended. The issues which were raised are detailed below and a recommendation is made as to whether or not the final Policy Statement should be modified to take into account these comments.

- 3.3 Sections 3.1/3.3 - The issue of rural de-population was questioned as overall the population in Angus has increased between 1981 and 1991. Whilst the total resident population has increased, certain areas of Angus have continued to experience de-population, in particular the remoter rural uplands. The references made in the Draft Policy Statement in respect of seeking to halt the decline of public transport services as a means of stemming rural de-population and addressing the issues of sustainability therefore remain valid. No change has therefore been made to the Policy Statement.
- 3.4 Sections 3.3/3.5 and 4.2.5 - It was suggested that there was a conflict between sections 3.3 and 3.5 with section 4.2.5. Section 3.3 and 3.5 deal with the role of public transport within the community, to assist those who do not have access to cars, as an attractive alternative for those with access to cars and taking into account the needs of the elderly and disabled in the provision of public transport services. Section 4.2.5 prioritises the allocation of resources to various journeys with travel to work being given the highest importance and journeys for leisure purposes the least. Sections 3.3 and 3.5 are only two of a range of objectives of Angus Council and have been taken out of context, for example, Section 3.1 seeks to accentuate the role of public transport services as a means of stemming rural de-population and supporting the provision of other services and employment opportunities. No change has therefore been made to the Policy Statement.
- 3.5 Sections 4.2.16/4.10 - The inclusion of a reference to the Disability Discrimination Act 1995 as it pertains to public transport was suggested. A new section 4.10.5 has been included.
- 3.6 Section 4.2.15 - One adjoining Authority has suggested that the proposed policy on cross-boundary service provision is amended to take account of the policy priorities and funding criteria of each funding authority. In order to allow some flexibility in negotiations with adjoining Councils the policy in this regard has been amended to read that under normal circumstances the Council's defined subsidy criteria would apply.
- 3.7 Section 4.5.3 - The possible inclusion of the detailed policies pertaining to operators participating in the Taxicard Scheme was suggested. These detailed policies have already been set out in Committee Report AC41/96 in respect of the Angus Council Taxicard Scheme and have not been included in this document which sets out the broader policy basis. No change has therefore been made to the Policy Statement.
- 3.8 Section 4.8 - It was requested that there should be liaison between Council Departments in respect of ensuring public transport access is considered when designing new housing developments.
- 3.9 Provision is already made in the Finalised Tayside Structure Plan 1993 where it is stated that ' In identifying land for development within Local Plans, due regard is taken of the capacity of the road network and the opportunities presented by existing and future public transport provision'. A similar statement has been included in the Public Transport Policy Statement.

- 3.10 Section 4.10.4 - It was requested that as well as grants being provided for modifying buses used on local bus services to meet some or all of the specification laid down by the Disabled Persons Transport Advisory Committee, grants should also be made available to assist the provision of accessible vehicles, such as super-low-floor buses. This request is considered to be reasonable and the policy in this regard has been amended accordingly. Grant applications whether for the conversion of existing vehicles or the provision of new buses will need to be contained within the budget provision.

4 OTHER AMENDMENTS TO THE DRAFT POLICY STATEMENT

- 4.1 As part of the budget savings exercise Angus Council agreed to withdraw, from 1 July 1996 the Concessionary Travel Schemes for 14 to 16 year olds and for 16 to 18 year olds in full time education. These changes are reflected in the Policy Statement together with updating where appropriate.

5 FINANCIAL IMPLICATIONS

- 5.1 There are no immediate financial implications resulting from this report.

6 CONSULTATION

- 6.1 The Directors of Education, Finance, Law and Administration, Roads and Social Work have been consulted in the preparation of this report.

7 CONCLUSION

- 7.1 The results of the consultation exercise have been considered and where changes to the Draft policy Statement have been perceived to be appropriate these have been incorporated into the final Policy Statement. It is now recommended that the attached document is published as Angus Council's Public Transport Policy Statement.
- 7.2 The Policy Statement provides an important framework setting out the Council's general policies on public transport services within Angus. This guidance will assist the Transport Team implement the Council's approach toward developing a cost effective network of public, education and community transport services. Members attention is drawn to the policies set out in paragraphs 4.2.3, 4.2.5, and 4.2.6 on bus services which are of particular importance in identifying and responding to any "gaps" in the commercial network.

NOTE

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above report.

AA/LEM/SP

Alex Anderson
Director of Planning, Transport and Economic Development

ANGUS COUNCIL PUBLIC TRANSPORT POLICY STATEMENT

1 INTRODUCTION

- 1.1 Section 63 of the Transport Act 1985 places a duty on Councils to formulate general policies from time to time for public transport services which they propose to secure to meet the travel needs within their Council area.
- 1.2 In formulating these policies, Councils are required under Section 64 to consult with neighbouring Councils whose area may be affected by these policies and with persons operating public passenger transport services within their area or with organisations appearing to the Council to be representative of such persons.
- 1.3 Consultation is effected by publishing a statement of the policies formulated and sending a copy of the statement to each consultee. The consultation exercise has been completed and this document is now published as Angus Council's Policy Statement. In order to set the policies in context a summary of the relevant background information is given before each of the policy areas.

2 DUTIES AND POWERS OF COUNCILS UNDER THE TRANSPORT ACT 1985

- 2.1 The Transport Act 1985 gives Councils the following main duties and powers with regard to public passenger transport services, these being defined as all services including school transport on which the public rely when not using private facilities of their own. (Section 63)
- 2.2 The main **duties** of the Council are summarized below:
 - (a) to secure the provision of such public passenger transport services as the Council consider it appropriate to secure in order to meet any public transport requirement within their area which would not in their view otherwise be met. (Section 63)
 - (b) to formulate from time to time general policies as to the descriptions of services they propose to secure having regard to transport requirements relating to education and social work. (Section 63)
 - (c) to conduct themselves, in the course of exercising their powers so as not to inhibit competition between persons providing or seeking to provide public passenger transport services in their area. (Section 63)
 - (d) to have regard to the transport needs of the elderly and disabled. (Section 63)
 - (e) to secure the best value for money from their expenditure on public transport, taking into account the full range of the Council's responsibilities. (Section 88)
- 2.3 In the execution of these duties the Council should consult adjacent Councils, public passenger transport service operators or organisations appearing to the Council to be representative of such persons. (Section 64).

2.4 The main **powers** of the Council are :

- (a) to enter into service subsidy agreements to provide services, normally by competitive tendering arrangements. (Section 63)
- (b) to take any measures which appear appropriate for the purpose of promoting the availability of public passenger transport services, whether commercial or subsidised and the convenience of such services, particularly bearing in mind the needs of the elderly and disabled. (Section 63)
- (c) to make grants for the provision of services, vehicles, equipment or other facilities for the purpose of facilitating travel for members of the public who are disabled. (Section 106)
- (d) to request that the Traffic Commissioner in relation to a particular traffic problem, applies a traffic order in order to :

- (i) prevent danger to road users;
- (ii) reduce severe traffic congestion;

by means of traffic regulation of

- (i) the routes of services;
- (ii) the stopping places for services;
- (iii) when vehicles used in providing services may stop at stopping places and how long they may stop for; and
- (iv) such other matters as may be prescribed. (Section 7)

3 **ANGUS COUNCIL OBJECTIVES**

- 3.1 To seek to halt the decline and accentuate the role of public transport services, particularly as a means of stemming rural depopulation and supporting the provision of other services and employment opportunities.
- 3.2 To maximise the economic, environmental and social benefits from expenditure on public transport within the limits of the available resources.
- 3.3 To develop the role of public transport within the community, providing mobility for those without access to cars, as an attractive alternative to those with access to cars and contributing to addressing issues of sustainability.
- 3.4 To seek the provision of socially necessary public transport services not provided commercially, commensurate with the demand for such services and the cost of provision.
- 3.5 To have particular regard to the needs of the elderly and disabled in the provision of transport services.

- 3.6 **To ensure that the public are kept informed of the public transport services available.**
- 3.7 **To ensure the best value for money from the total expenditure on passenger transport, taking into account the full range of the Council's responsibilities.**

4 ANGUS COUNCIL POLICIES

4.1 Angus Council policies on public transport have been prepared against a background of limited resources available to address demands. It continues to be essential to make the best use of the resources available and this statement is designed to assist this.

4.2 Bus services

4.2.1 There are 12 bus companies operating local bus services within Angus. Operators are required to register these local bus services with the Traffic Commissioner and there are currently 90 "live" registrations of which 53 are cross-boundary services to neighbouring Council areas. Operators may register, change or cancel registrations normally subject to 42 days notice. There is a need therefore to continually monitor the commercial network and identify any "gaps" in the services provided. Services required which are not provided commercially are operated under contract to the Council. At April 1996 there were 49 contracts provided at a cost of £312,000 per annum (1995-96 prices).

4.2.2 **The Council will determine the level of support for bus services over and above the commercial network, on the basis of an on-going review of needs and a continuous monitoring of existing facilities.**

4.2.3 **The Council will seek to secure local bus services additional to those provided commercially by means of entering into service subsidy arrangements. Subsidy will only be paid where the subsidy per passenger, as defined below, does not exceed £2.50 per passenger or the cost per mile does not exceed £1.25. These subsidy levels will be subject to continual review in the light of available resources.**

4.2.4 Passenger journey as used to determine subsidy per passenger is defined as:

- (a) a passenger journey is a single journey by one passenger
- (b) a passenger journey will only count for the purposes of subsidy if no reasonable alternative service exists.
- (c) a reasonable alternative does not exist if there is no service between stopping points within reasonable distance of the origin and destination of the trip, such distance being taken as 400m for able bodied travellers but subject to adjustment for special circumstances such as steep hills for mobility impaired passengers.
- (d) a reasonable alternative does not exist if there is no service timed less than the following time periods away from the service concerned :

- (i) For journeys to work 16 minutes ie where service frequencies are reduced from every 15 minutes to every 30 minutes no replacement subsidised services will be sought.
- (ii) For journeys for other purposes, 31 minutes ie where service frequencies are reduced from every 30 minutes to every 60 minutes no replacement subsidised services will be sought.

Work start/finishing times will be taken into account when the reasonableness of alternative services are taken into consideration.

- (e) a reasonable alternative may involve a change of vehicle or change of mode of transport. Consideration will be given to the interchange, waiting time and total journey time in determining whether such an alternative is reasonable.
- (f) passenger journeys to or from work will be counted as double for the calculation of subsidy per passenger to reflect the importance of these trips when compared for example with leisure trips.
- (g) subsidy per passenger may be exceeded for example where the service in question provides the only journey of the week for shopping from a settlement. In such instances these services would be reported annually to Council for them to consider the appropriateness or otherwise of their continuation.

4.2.5 Priority in the allocation of resources will be given to services in the following order from most important to least:

- journeys to work
- journeys for hospital visiting
- journeys for shopping
- journeys for education (those not entitled to free transport as defined by the Education (Scotland) Act 1980
- journeys for leisure

4.2.6 The Council will normally provide subsidy for bus services on the basis of entering into a contract following competitive tendering. However, financial support may be provided without seeking tenders in the following circumstances:

- (a) on an emergency basis to replace an existing service for which notice has been given of withdrawal, or to replace a service for which notice has not been given.
- (b) where a service is required to fulfil an urgent transport requirement.
- (c) where a service can be most economically obtained by deviation or extension of an existing service, and the cost falls within the de-minimis limits outlined in the Transport Act 1985.

- (d) where the cost of the service is so low that any financial savings from seeking tenders are unlikely to be outweighed by the administrative costs involved (up to £1000 per annum).
 - (e) in any other circumstances where the costs fall within the de-minimis limits of the Transport Act 1985 and it is clear that financial savings are unlikely to be made through seeking tenders.
- 4.2.7 Operators will be invited to tender for services on a fixed subsidy basis, this is where operators keep the revenues from fares. Occasionally contracts may be entered into on a fixed cost basis, where the fares revenue will be deducted from payments.
- 4.2.8 Contract prices will be subject to an annual inflationary increase based on relevant components of the retail price index.
- 4.2.9 In any subsidy based contract the Council will specify the maximum farescale that must not be exceeded, this will be adjusted from time to time in line with inflation. Within this maximum farescale Operators will be free to alter their fares subject to a specified period of notice to the Council.
- 4.2.10 On cost based contracts the Council will specify the level of fares to be charged, these will be generally in line with the previous fares on the service or the fares on other services on common sections of route.
- 4.2.11 Contracts operated under subsidy to the Council will be monitored to ensure compliance with the conditions of contract, operators previous performance will be taken into account when contracts are renewed.
- 4.2.12 The Council will normally award contracts to the lowest tenderer. Consideration will, however, be given to awarding a contract at a higher price where the service is to be provided by a vehicle meeting the DPTAC (Disabled Persons Transport Advisory Committee) specification.
- 4.2.13 The Council will generally award subsidy contracts for periods of three years but with the provision that the contract may be extended by mutual agreement for up to a further twelve months.
- 4.2.14 The Council will publish as required by the Transport Act 1985 details of the financial support for bus services as a result of the tendering process.
- 4.2.15 Subsidy contracts for cross-boundary contracts will be awarded in consultation with neighbouring Councils. Under normal circumstances the subsidy criteria determined by the this Council will apply. Arrangements for allocating the subsidy cost between authorities will be negotiated, based either on mileage within each Council area or usage by the residents of each area, whichever is deemed to be the most appropriate.

4.2.16 The Council will seek to enhance the provision of transport for special needs groups.

4.2.17 In specific circumstances of traffic congestion, or where the safety of the public may appear to be at risk, the Council will give consideration to requesting that the Traffic Commissioner places traffic regulation conditions on the Operators' licences so as to exercise control as necessary over bus stops, routes, or the duration of stopping times.

4.2.18 The need and justification for additional public transport services will be kept under review. When the introduction of additional services is considered to be appropriate and resources are available, such provision may be initially provided on an experimental basis. Such experimental services will be reviewed against subsidy criteria to determine the justification for their continuation.

4.3 Education Transport

4.3.1 The Council has a statutory responsibility under the Education (Scotland) Act 1980 with regard to the provision of scholars conveyance to/from school. The Transport Act 1985 also requires that Councils co-ordinate Education Transport with local bus services in order to obtain the best value for money.

4.3.2 In Angus as of April 1996 there were a total of 146 contracts carrying 2178 pupils, in addition 521 pupils travel on local bus services on season ticket arrangements. The total expenditure on Education Transport is £1,147,600 for the 1995 -96 academic year.

4.3.3 The Council will seek to secure school transport services by inviting tenders for the conveyance of scholars, or by the purchase of season tickets on any registered local bus service or rail service which meets the Council's requirements.

4.3.4 The Council will generally only consider the purchase of season tickets where they are offered at a discount, and in the event of two or more operators registering such services on a route, the Council will purchase season tickets, providing capacity is available, on the service offering the best value for price.

4.3.5 In order to maximise its network, the Council will encourage operators of school contract services to register their contracts as local bus services where capacity permits.

4.3.6 The Council will undertake Scottish Criminal Record Office checks on all drivers and escorts involved in the conveyance of school children.

4.4 **Social Work Transport**

- 4.4.1 The Transport Act 1985 requires councils to have regard to Social Work Transport requirements. The Taxicard Scheme and the Travel Concession Schemes are of benefit to many Social Work clients. In addition a Transport Forum has been established in Angus. The Transport Forum brings together Community Councils, bus users, organisers of disabled and voluntary groups, bus and taxi operators and officers from various Council departments. The Forum aims to identify the transport needs of the community and find solutions to any problems. Communities are encouraged to undertake surveys of their transport requirements.
- 4.4.2 **The Council will have regard to Social Work transport requirements in the development of transport policies and provision of services.**

4.5 **Taxicard Scheme**

- 4.5.1 The Council organise and manage the Angus Taxicard Scheme. This is a scheme specifically for the disabled who are unable to use local bus services and allows taxicard holders to travel in taxis at reduced fares.
- 4.5.2 Operators are encouraged to participate in the scheme and grants are available for the provision of wheelchair accessible vehicles or the adaptation of existing vehicles to make them more accessible. Driver training is given on the carriage of wheelchair passengers.
- 4.5.3 As of April 1996 there were 17 operators participating in the Angus Taxicard Scheme. The cost to Angus Council for 1996 - 97 for providing this scheme is estimated to be £30,000.
- 4.5.4 **The Council will in the light of available resources review its eligibility criteria and fares to be charged on the Taxicard Scheme from time to time.**
- 4.5.5 **The Council will, subject to available resources, provide grants to operators for the provision of wheelchair accessible taxis and installation of swivel seats.**

4.6 **Travel Concession Schemes**

- 4.6.1 The Council organise and manage the Travel Concession Schemes provided under the Transport Act 1985. The eligibility of applicants to join the schemes are assessed and passes are issued, it is estimated that there may be up to 20,000 Concessionary pass holders in Angus. In addition payments are negotiated and paid to operators so that they are no better and no worse off through participating in the schemes. The cost to the Authority for 1996-97 for providing these schemes is estimated to be £650,000.
- 4.6.2 **The Council will provide travel concession schemes for the following groups ; Senior Citizens, Blind, Disabled, Severely Disabled.**
- 4.6.3 **The categories of person who qualify, eligibility criteria and fares to be charged under any or all the schemes will be reviewed from time to time.**

4.6.4 **Reimbursement arrangements for the operators will be reviewed at least annually and any variations in terms of participation will be published.**

4.6.5 **The Council will require the schemes to be operated on all local bus services in Angus and to a number of designated destinations outwith Angus. Where necessary the Council may serve participation notices on any operators refusing to participate voluntarily.**

4.7 **Rail Services**

4.7.1 **Most public transport requirements in Angus are met by local bus services. Passenger rail transport in the main caters for longer distance travel although there is still significant use of rail services to/ from Dundee. The Council actively encourages local rail travel through the Concessionary Travel Schemes and Taxicard scheme which permit passholders to travel free or at reduced fares on rail services within Angus or to/from Dundee. Financial support has been made in the past to ScotRail through the provision of a Revenue Guarantee in respect of an additional stop at Carnoustie Station and advertising of timetable enhancements between Carnoustie and Dundee.**

4.7.2 **The Council will seek to maintain a close relationship with Railtrack and the rail operating companies and to consider from time to time any action which may be appropriate to ensure the maintenance of the existing rail services in the area, the provision of appropriate rolling stock and the improvement of station facilities. Subsidy may be paid to ensure the maintenance of services and the criteria referred to in paragraph 4.2.3 will apply.**

4.7.3 **The Council will seek to identify the needs of rail passengers from within its area which are not already being met and examine with the Rail Companies, and if appropriate adjoining Councils, how they might be met.**

4.7.4 **In respect of proposed timetable revisions to local rail services the Council will seek early consultation with Railtrack to enable their views to be taken into account.**

4.7.5 **The Council will consider making grants towards the re-opening of railway stations where such re-openings are in the interests of the travelling public and a reasonable useage is forecast subject to the availability of financial resources.**

4.7.6 **The Council will, in conjunction with adjacent Councils and other interested parties, seek to persuade Railtrack of the need to electrify the main line from Edinburgh to Aberdeen through Angus.**

4.7.7 **The Council will seek to persuade rail companies and the Government that it is vital to take into account the wider social, economic and environmental issues when considering future development and investment in the rail network.**

4.7.8 **The Council will seek to co-ordinate other public and private transport with rail services.**

4.8 **Infrastructure**

- 4.8.1 The provision of high quality public transport infrastructure such as bus stations and passenger shelters is a key element in the provision of an attractive public transport service. The Council own and manage Arbroath Bus Station. In addition it owns 160 bus shelters and has a further 25 provided by Adshel a commercial company. The shelters provided are of a high standard and are being constantly updated.
- 4.8.2 **The Council will seek to improve the standard of passenger waiting facilities by the provision of infrastructure such as bus stops, shelters and bus stations where appropriate.**
- 4.8.3 **The Council will subject to the availability of resources give consideration to minor highway improvements such as the construction of bus turning areas or lay-bys to facilitate the operation of bus services and in the interests of public safety.**
- 4.8.4 **The Council will in identifying land for development within Local Plans take due regard of the capacity of the road network and opportunities for both existing and future public transport provision.**

4.9 **Publicity**

- 4.9.1 The Council produce and distribute timetable leaflets for all local bus services in Angus, it also produces a bus map for Angus and a series of leaflets giving ideas for days out by bus or train from the main Angus towns. The provision of this information promotes the use of public transport by both local residents and tourists. Passenger information is also provided at bus stops and there are currently 214 information boards at key stops.
- 4.9.2 **The Council will seek to keep the public informed of all public transport available within its area by producing appropriate publicity material, in conjunction with operators, and make available comprehensive timetable information on both bus and train services.**
- 4.9.3 **The Council will continue to provide roadside publicity at key bus stops and shelters and will expand this provision in line with the staff and financial resources available.**

4.10 **Transport for Mobility Impaired and Disabled Persons**

- 4.10.1 The Taxicard scheme and the Travel Concession Schemes for the Blind, Disabled and Severely Disabled are aimed to meet the transport needs of the mobility impaired and disabled. Operators are actively encouraged through the provision of grants to provide accessible buses or taxis. The Council also provides driver training on the carriage of wheelchair passengers.

- 4.10.2 Regular discussions via the Angus Transport Forum take place with organisations representing the disabled and mobility impaired and it is hoped that these groups will contribute to studies to investigate the travel needs of these individuals. A Transport Guide for Angus which will include details of all services available to the disabled and mobility impaired will be published in 1996.
- 4.10.3 **The Council will encourage the provision of transport facilities to assist passengers with impaired mobility resulting from age, disability or other causes. Services provided by the Taxicard scheme will play an important role in fulfilling this requirement. In the longer term the Council will investigate the setting up of community transport schemes.**
- 4.10.4 **The Council will consider making grants available for the modification of buses used on local bus services to meet some or all of the specification laid down by the Disabled Persons Transport Advisory Committee (DPTAC) or to assist in the provision of accessible vehicles such as super-low-floor buses. Operators will be encouraged to use buses meeting the required specification on services operated under contract to the Council by preferential consideration in the tendering process, where appropriate.**
- 4.10.5 **The Council will comply with the provisions of the Disability Discrimination Act 1995 pertaining to public transport in respect of taxis, buses and coaches, and trains.**

4.11 **Consultation**

- 4.11.1 The Council consult with local communities on all revisions to subsidised local bus services. Due to the tight timescales involved when operators decide to amend the commercial network (42 days) it is not always possible to carry out a consultation exercise, however communities are informed of any service revisions which will take place.
- 4.11.2 The Angus Transport Forum provides an opportunity for all communities to highlight their transport problems and look to either conventional or innovative solutions to them. A recent survey of travel needs in Auchmithie resulted in the successful retiming of an existing local bus service contract to meet work and scholars requirements and the introduction of an evening bus service to Arbroath.
- 4.11.3 **Subject to the limitations imposed by the timescales of the registration procedures as laid down in the Transport Act 1985, the council will seek to consult local communities when significant changes are proposed to bus services and when subsidy contracts are due to be retendered.**
- 4.11.4 **The Council will liaise with local communities, the Voluntary sector and Transport Operators in examining and developing either conventional or innovative approaches to solve transport problems.**
- 4.11.5 **The Council welcomes and encourages comments and suggestions on all transport matters.**