



EDUCATION, LEARNING  
AND ATTAINMENT

18 May 2023

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Dear Laura

**Changes to mileage limits for mainstream home to school transport**

Thank you for the opportunity to comment on the proposed changes to free school transport distance eligibility for primary and secondary school pupils in West Dunbartonshire. Having considered the proposal, we have set out a number of comments in the attached appendix.

Bearing in mind SPT's role as agent for the provision of school transport on behalf of West Dunbartonshire Council our comments are restricted to the potential impacts of any change in the Council's policy specifically in relation to home to school transport.

We hope these comments are helpful. It is a priority for all of us to ensure the safety of our young people travelling to school and it is essential that every appropriate consideration has been given to ensuring that any change to the policy on distance eligibility for free school transport has been fully considered and appropriate mitigations put in place.

SPT is committed to working with the Council to achieve this and we welcome the mitigations and measures contained in the proposal to ensure the ongoing safety of pupils

SPT would be happy to discuss our comments further if helpful.

Yours sincerely

Gordon Dickson  
Head of Bus Strategy & Delivery

## APPENDIX

Changes to mileage limits for mainstream home to school transport – SPT comments.

### Comments

The introduction of the proposed new policy on distance eligibility for free school transport may have a range of impacts including on the following:

- Pupil safety
- Road safety and congestion
- Modal shift / emission
- Demand for public transport services
- Timetable for changes

In considering whether to implement this policy change, the Council is required to have due regard to the potential impact on service users with protected characteristics such as age and disability (for those children not covered by Special Needs Transport).

As such, WDC may wish to consider, if not already undertaken or in process, and prior to any decision being taken, that an Equality Impact Assessment (EIA) be undertaken to address potential differential impacts on service users and any appropriate mitigations that may be required to address negative impacts.

The benefits of home to school transport include reduced car journeys and congestion, and improved safety especially around schools as well as helping support pupils' attendance. An EIA should therefore consider:

- An assessment of the travel and transport needs of pupils.
- An assessment or audit of sustainable travel and transport infrastructure.
- A strategy to develop the sustainable travel and transport infrastructure within West Dunbartonshire so that the travel and transport needs of children and young people are best catered for.
- Promotion of sustainable travel and transport modes.

### Safety / environmental impacts

Safety will be the critical factor in any decision to change free home to school distance eligibility. We welcome the Council's reference to safety in its proposals and the consideration being given to what represents a safe walking and cycling route which would encompass road type, crossing points, general road speeds, road lighting, passive surveillance etc.

Analysis should be undertaken on the likely impact arising from any change to reduce distance eligibility of free school transport of more car-based school trips to schools both in terms of the immediate vicinity of schools and also the wider road network. This could result in localised congestion and, if there are not effective measures to restrict car parking at school gates, to potential safety issues for pupils and car drivers. We note reference in the proposals to the potential for improvements to air quality and these should be considered in relation to any potential increase in car journeys to schools.

There may also be a high impact for a minority of pupils either living in areas with limited or no access to either public bus services or private transport at appropriate times. For pupils in rural areas there may be issues of road safety on country roads and consideration needs to be given here as to what is considered a 'safe' journey. A blanket approach may not be appropriate in all circumstances and there should be an opportunity for parents / guardians to appeal the policy on a case by case basis reflecting their local circumstances.

We would also note that pupils who become ineligible / no longer meet the criteria may be more likely in future to be driven to school on more occasions given the longer walking distances especially during adverse weather or winter dark.

In undertaking this assessment, consideration should be given to whether there will be any requirement for additional active travel infrastructure / measures required to be installed ahead of the introduction of the new policy.

#### **Demand for public transport services**

Any change to limit the distance eligibility for free home to school transport may have impacts on the demand for public transport services. As such consideration will require to be given to what those impacts are likely to be and whether any mitigations, adjustments or interventions are required to ensure continued safe and available transport services are available. As such we would suggest an assessment be undertaken to establish the following:

- The impacts on demand for supported or commercial bus services arising from such a policy change
- Whether any additional demand will impact capacity on commercial and supported bus services especially in the am/afternoon peak.
- The availability of public transport options and whether there is likely to be any requirement to strengthen supported service provision as a consequence of this change to policy.

Ahead of any decision to implement the new policy, the Council should undertake discussions with local bus operators to consider the potential impacts on commercial bus services of the policy's introduction and whether there is sufficient capacity under current provision to accommodate additional pupils on commercial services.

We welcome the Council's reference to promote School Travel plans and the engagement in the Eco-Schools Scotland programme to provide parents and pupils with advice on sustainable and safe travel to school and discourage unnecessary car travel to schools. Sustrans School Transport Planning Toolkit is also useful resource as is Living Streets who are keen to talk to Councils about opportunities around their WOW Walk to School campaign. Related to this, it will be important that WDC as with all councils maximises the promotion of uptake of the Under 22's NEC card.

We would recommend that impacts of the any policy change be subject to monitoring and evaluation including general impacts on traffic levels in addition to those immediately adjacent to schools as noted above in relation to safety.

#### **Timetable for proposed change**

It is also essential to be clear on the timescale associated with any change to eligibility. SPT begin the contract specification process in late September / early October and, as such, it will be essential to obtain confirmation of WDC requirements by this point ahead of any procurement exercise in early 2024 ahead of schools returning in August 2024. This is a critically important point.