

## **Comments on the Previous Government's response to the Yellow School Bus Commission's Report and Recommendations**

### **Executive Summary**

The Yellow School Bus Commission (the Commission) has reviewed the previous Government's response (the response) to the Commission's Report and Recommendations<sup>1</sup>.

The Commission remains convinced of its key recommendation to progressively introduce dedicated school buses to Britain's primary schools because the clear benefits remain unchallenged by the previous Government's response.

These include improved safety and security for children and the £462m of economic and environmental benefits from removing 130m cars from our roads at a time when the funding of other policies to encourage modal shift is under pressure following the Comprehensive Spending Review.

The Commission is also disappointed at the lack of depth and breadth in the response. The Commission's report is based on a wealth of empirical evidence from both the UK and North America and its recommendations are largely focused on primary school children. By contrast, the response is largely based on a single study of secondary school bus provision.

The response was also sidetracked by the possibility that a small number of pupils currently walking to school may in future opt instead to catch a new school bus service. In doing so it largely ignored the benefits of the much larger numbers who would switch from their current car journeys to cleaner, greener buses. Less than 4% of those who currently walk are predicted to use the yellow school bus. The number travelling by bus would treble with 80% of these new passengers on cleaner, greener buses switching from the car.

The "elephant in the room", so to speak, is the "school run". The response wholly ignores it, as well as the chronic effects of its inexorable rise. The number of children travelling to school by car has doubled in the last 20 years and could do so again in the next 20 unless attractive alternatives are provided.

While the appeal and convenience of the car are unarguable the effects of the school run are profound and disturbing. It contributes to:

- the rise in obesity among the young
- up to 20% of the cars (1 in every 5) on our roads in the morning peak
- over £360m of extra costs to parents, in terms of lost time, work opportunities forgone, added congestion and direct operating costs, from making unnecessary car journeys

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<http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/pgr/sustainable/schooltravel/yellow-schoolbus/doc/report.doc>

- a significant environmental impact of about one million tonnes of extra CO<sub>2</sub> emitted each year, effecting air quality and health
- Danger at our school gates
- Parking hazards in an area of high volume of young pedestrians

There is a legitimate debate to be had as to how best to tackle the school run – but the response to the Commission’s Report and Recommendations doesn’t attempt to do so. The Commission feels that it has made the most compelling case – indeed, the only coherent and comprehensive set of proposals, which fully incorporate a move to encourage walking and cycling as well.

The Commission’s proposals provide solutions to the policy objectives of a number of departments (Department for Transport, Department for Schools and Education, Climate Change, Local Government and Communities). That versatility and ubiquity may have inadvertently undermined its appeal from a narrow Departmental perspective.

No single department has responsibility to reduce the impact of the school run but that doesn’t mean that the Government can simply ignore the problem.

The Commission fully understands that the current significant pressures on the public purse prevent an immediate commitment to a national roll out of dedicated school buses, but feels that the Government should invest in further large scale pilot schemes to validate the benefits the Commission’s report has identified.

The Commission considers that addressing the school run is a potential spend to save measure, when taking into account the benefits and the need for change. Addressing these issues is essential; delay will potentially add to costs and postpone the benefits.

The Commission is also keen to respond to some of the points raised in order to clarify its position as well as to correct some factually inaccurate points; this is the main purpose of this document.

There are a number of key themes of the Government response:

**The previous Government proposed a case by case approach to yellow school bus provision rather than a standardised approach advocated in the Commission’s report and recommendations.**

The Commission’s report and recommendations attempted to review and highlight the wider benefits of yellow school bus services, propose national standards based on best practice and then provide some overall indication of the costs of introducing yellow school bus at a nationwide scale.

In the introduction to its cost benefit analysis the Commission report acknowledges that there would be significant local variations to the costs and benefits presented. The work was not presented as a detailed analysis at the local level.

The Commission appreciates the suggestion that a case by case dimension to the assessment would add value, however, it does not feel that national standards would be counter-productive to this. Rather, it would argue for a case by case approach within the framework of a national standard. This is relevant to current work being conducted by University of Aberdeen and Metro (WYPTE) to develop a local level cost benefit tool.

Even allowing Government's clear policy of not directing from the centre policies which can better be designed and delivered at local level, the Commission's report asked for a co-ordinated approach to ensure that the design and delivery of school bus provision was sensibly and efficiently joined up. In addition, allowing local school and authorities to choose whether or not to pursue the Commission's recommendations will in effect mean that the aggregate economic and environmental benefits of all schools following these proposals will simply be lost. It will also risk strong criticism of an inconsistent approach to quality and safety in relation to the movement of young people to and from school.

**The previous Government response suggests that the provision of yellow school bus services will create undesirable competition with walking/cycling**

Notwithstanding the first statement made in the response, that "The Government wants as many children as possible to walk, cycle or use public transport to travel to school", the Commission finds it disappointing that the perceived competition **between** walking, cycling and yellow school bus forms a major theme of the DfT response.

This is a misinterpretation of the Commission's work since it is also the position of the Commission to encourage as many children as possible to walk, cycle or use public transport to travel to school. There is little recognition in the DfT response that a new bus service which attracts more than 4 car users for every walker or cyclist attracted is worth consideration. There is also no recognition that a new nationwide yellow school bus service to primary schools is likely to result in nine times as many children travelling by bus to school.

Far from adding to overall CO<sub>2</sub> emissions by switching young people from walking to travelling by bus, the central point of the Commission's report's recommendations are to take hundreds of thousands of children out of private cars and on to public transport thus saving in aggregate 130m car journeys and the corresponding 60,000 tonnes of CO<sub>2</sub>.

**It is suggested by the previous Government's response that there are barriers to introducing high value for money yellow school bus services which have not been fully tested.**

It is accepted that there are numerous aspects of delivering high value for money yellow school bus services which would benefit from further investigation. The limited evidence from existing initiatives set up with differing priorities and goals do not provide comprehensive answers to many questions specific to primary school provision. This is precisely why some detailed large-scale operations are required. However, these answers will never be fully provided unless there is a widespread roll out of the Commission's recommendations

The Commission believe that such a roll out will confirm that parents of young

children or those with Special Education Needs are prepared to use the service. Furthermore it will demonstrate the low impact on walking and cycling distances over a mile, the ability to deliver target occupancy, that mode shift from car is achievable, that schools can cooperate and cluster effectively and that extended schools provision provide the means to allow double runs. Post implementation analysis will also confirm what cost benefit can be achieved.

With respect to children with special needs, where possible all children should attend mainstream schools and, as part of training for life, should experience school life as well as transport to and from school alongside their peers. The Commission's proposals deal with issues of bullying through provision of CCTV, trained drivers and an approach with an emphasis on quality.

The Commission firmly believes that there is a need for a large scale pilot focussing on primary provision (as opposed to MyBus which was designed to replace existing contracted provision, normally to secondary schools, coupled with a second run, normally to primary school - which so strongly influences the WSP contribution) in order to properly answer these questions.

**No new funding will be provided by the Previous Government and although it is acknowledged that in some areas yellow school bus operations can be successful, the response maintains that introduction of yellow school buses is for local determination.**

Whilst disappointed with the overall response, the Commission remain convinced, based on its report and the points outlined in this document, that the recommendations retain significant merit and the benefits remain clear.

The Commission recognises the pressures on public sector funding but feels that the new Government should fully consider the benefits of yellow school buses as part of an economic and environmentally sustainable solution to the problems that flow from the school run.

The Commission's proposed phased approach also enables the introduction of these recommendations over time as and when government funding is available to improve transport for this key segment of regular commuters.

The remainder of the document addresses the DfT's response to the Yellow School Bus Commission's Final Report's Recommendations.

## **Yellow School Bus Commission Recommendation 1**

### **All schools should continue to promote walking and cycling for pupils living within one mile from primary school and two miles from secondary school.**

The competition between walking, cycling and yellow school bus forms a major theme of the DfT response. This is a misinterpretation of the Commission's work. Clearly, limits on walking distance is a variable which can be altered according to circumstance. Issues of infrastructure (e.g. footpaths and street lighting) are relevant, especially in rural areas. In areas where new and safe infrastructure for walking and cycling have been introduced, and are proving to be effective at stimulating mode shift from car, then the lower limits for bus pick-up can be adjusted to suit the circumstance.

The first statement in the response to the Commission's Report and Recommendations is that "The Government wants as many children as possible to walk, cycle or use public transport to travel to school". It is interesting to note that at present the current proportion of primary pupils living between one and five miles from school attended who walk, cycle or use public transport is 28% (approx 450,000 pupils); the introduction of yellow school buses is estimated to increase this to 50% (approx 800,000 pupils). This is a far greater increase than can be achieved through walking and cycling initiatives for these distances. While the Commission accepts that introduction of yellow school buses would attract a small percentage of walkers and cyclists, these would only be those who walk or cycle the longest distances often through necessity rather than choice and in some cases on unsuitable routes. It is felt that the reduction of a very small number of existing walkers and cyclists does not provide a strong enough argument to disregard the benefits of considering a yellow school bus service, particularly the vastly more significant number of children driven to school.

Any transfer of a small number of walkers to a yellow school bus service would be offset by the larger number of pupils walking to the bus rather than being driven. The response to the Commission's Report and Recommendations ignores the fact that currently 41% are driven to primary school, and crucially almost a third of those being driven are in the 1 – 2 mile band.

The 2006 Education and Inspections Act amendments to statutory distances for pupils aged eight and over does not address the needs of the majority – only the minority from low income families.

Over the last decade local authorities have often reduced/withdrawn discretionary transport (including the offer to those attending faith schools) due to financial constraints.

The negative shift from walking and cycling to yellow school bus highlighted from West Yorkshire may be a concern but this needs to be investigated further to ascertain the reasons for this shift which may be entirely reasonable. Additionally, this is only one example and therefore not really sufficient to provide an evidence base.

## Yellow School Bus Commission Recommendation 2

**Yellow school bus services should be offered for all primary school children living over one mile from school. Such buses should feature dedicated drivers and a range of other optional elements such as CCTV, registers and voluntary or employed escorts**

The Commission welcomes the Government's support in principle for yellow school buses. It also accepts that based on a purely *financial-driven* approach to value for money (following existing appraisal guidance) there will be wide variations in the value for money possible at different yellow school bus locations.

A case by case assessment would certainly highlight the instances which are likely to provide the greatest benefits or require the least new funding (this is often not the same). However, the Commission believes a case by case approach would produce a postcode lottery and miss out on many of the economies of scale associated with a nationwide approach.

A sensible next step would be to develop a local level cost benefit assessment tool which would aid authorities, schools and Government to conduct case by case assessments.

The list of barriers to achieving value for money provided by the WSP Yellow School Bus Evidence Review Phase 2 Report have, in many cases, been flagged as such and discussed in the Commission report.

The need to serve more than one primary school is recognised in the Commission's report. Indeed, it is identified as an essential prerequisite to achieving the necessary occupancy for the cost benefit analysis to hold. The response is correct to identify this as a risk which perhaps highlights the need for further carefully designed pilots to test its significance.

The concern over a lack of part-time drivers highlighted in the WSP report did not feature in the Commission report, however, the evidence from North America on part-time drivers shows there are many people with child care responsibility for which a school day only employment is most suitable. In addition evidence from West Yorkshire suggests that far from presenting recruitment difficulty, the YSB scheme attracted additional driving resource.

With respect to the current exclusion from the analysis of negative carbon emissions, our calculations on this suggest that the average daily emission from a yellow school bus equates to 12 rather than 22 primary pupils (as suggested by WSP) transferring from car. Using this calculation, even in the worse case scenario presented in the WSP report, there would be no net increase in CO<sub>2</sub> as a result of new yellow school bus services. It is also likely that the provision of yellow school bus services will replace a number of existing dedicated school bus services and so, in such circumstances, the yellow school bus contributes no additional emissions which need to be offset.

Whichever calculations are used, in financial terms for the Benefit-Cost Ratios (BCR) assessment, the variation in contribution of CO<sub>2</sub> emissions is negligible. Thus, even allowing Government's clear policy of not directing from the centre policies which can

better be designed and delivered at local level, the YSBC report asked for a co-ordinated approach to ensure that the design and delivery of school bus provision was sensibly and efficiently joined up. By entirely delegating decision making to local level, Government or society lose the benefits of total place. In addition, allowing local school and authorities to choose whether or not to pursue the Commission's recommendations will in effect mean that the aggregate economic and environmental benefits of all schools following these proposals will simply be lost.

It is difficult to comment on the BCR analysis conducted by WSP and referred to in the response to the Commission's Report and Recommendations as The University of Aberdeen have not had access to the appendix where the calculations are contained. However, it should be noted that the WSP calculations which are detailed in the main report (page 9 of WSP Yellow School Bus Evidence Review: Phase 2 Report FINAL) have applied an erroneous calculation for increase in operating costs which result from an assumed higher bus purchase price of £120,000. This compared to £84,500 by the Commission, based on the price of the BMC yellow school bus and the potential pricing of other models in due course to reflect sales volume, and thus economies in production, of a wider roll out of yellow school buses.

Even using the higher purchase price, WSP calculate that the operating costs will increase from £42,500 to £60,700 p.a. due to this increased bus purchase cost whereas it would actually only increase from £42,500 to £46,500 p.a. (with 12 year straight line depreciation and a borrowing interest rate of 5%). Therefore the range of BCRs presented by WSP (ranging from around 0.4 to 2.1) are likely to be much lower than they would be in reality.

**As these ratios have been used throughout the response as a main argument for rejecting a national scheme they should be revisited.**

WSP highlight in their report that the assumed annual £42,500 operating cost quoted in the Commission's report may be an underestimate given it excludes route planning, call centre booking services and school infrastructure. Route planning and call centre booking services do not need to be excessive if done on a large scale. Furthermore the Commission estimates did include a component for administration to cover such costs within its calculation of operational cost. The Commission recognise that school infrastructure costs may be an extra and in some cases significant cost.

WSP concluded that the shortfall for the Commission's proposal (for primary schools) would result in a funding bill representing a 50% higher cost than the current funding for transport to primary schools. The Commission state clearly that the funding bill would be closer to 100% higher than current funding for transport to Primary Schools – but of course far more pupils would benefit: almost nine times as many.

The response to the Commission's Report and Recommendations states that the latest National Travel Survey data available shows that 29% of children aged 5 – 10 who live between one and two miles from school walk and 2% cycle. This does not match school census data from 2009 which indicates that these figures are much lower (e.g. 13.5% and 1.2% respectively for the South West region). What has been overlooked by the response is the 66% of primary pupils in the 1 – 2 mile band who are driven to school.

This further suggests that the potential conflict with and impacts on walking and

cycling have been overestimated in the response.

There are significant cost implications for a national roll out but crucially the numbers of pupils travelling by bus would increase nine-fold.

### **Yellow School Bus Commission Recommendation 3**

#### **Improve secondary school bus services by increasing existing bus provision, raising quality standards, enhancing driver training, and using technology to promote good on-board behaviour**

A two tier system of provision where some pupils travel on a new dedicated yellow bus and others use existing public transport that has not benefited from investment is, to some extent, inevitable whichever approach is adopted. Introducing yellow school buses on a case by case basis certainly creates a two tier system. The Commission's report considers the need for investment in the existing public transport network for school services and promotes use of this ahead of new yellow school bus services for secondary pupils. The argument not to invest in new services as it may create a two tier system will reinforce the current trend of increasing numbers of pupils being driven to school.

### **Yellow School Bus Commission Recommendation 4**

#### **Consider providing yellow school bus services for distances greater than two miles to secondary schools, where there are special circumstances such as poor existing bus services and use, serious challenging behaviour of pupils on the public bus network or the potential to link services with suitable primary school provision.**

The evidence based part of this response (from the Greater Manchester initiative) supports introduction of yellow school bus services. The Commission consider that the rest of the response against yellow school bus services is rather subjective. From visits to many yellow school operations, the Commission regularly heard that behaviour was improved through the introduction of higher quality vehicles, coupled with many of the measures recommended in the Commission's report.

Whilst this would potentially merit examination of these issues further, developing on some of the good work undertaken by many yellow school buses already operating, it is likely that improving behaviour through a controlled environment is likely to be more effective and less disruptive for all public transport users.

### **Yellow School Bus Commission Recommendation 5**

#### **Undertake a phased and properly coordinated expansion of yellow school bus services for primary age pupils over the next five years, with a final annual investment of £154 million revenue per annum at steady state.**

The response to the Commission's Report and Recommendations states that MyBus and other yellow school bus services indicate that actual load factors tend to be significantly lower than that assumed in the Yellow School Bus Commission report,

particularly for primary schools. It should be understood that the MyBus services were designed with different priorities (primarily to accommodate existing eligible pupils who were predominantly secondary age) which is one reason for the low load factors for Primary Services. The RidePegasus initiative, the only multi-vehicle yellow school bus type service in the UK designed exclusively for Primary pupils, actually had load factors higher than those assumed in the Yellow School Bus Commission report, although it is accepted that smaller capacity vehicles were used on this service than those in the Commission's modelling.

The above point demonstrates the need for the development of primary school operations – hence the argument for establishing wider scale operations following the Commission's recommendations.

It is true that the high load factors and take-up assumed in the Commission's modelling would be difficult to achieve in less-densely populated areas and where schools cannot be linked. This leads to the response's call for services to be assessed on a case-by-case basis and to consider the potential cost and benefits of alternative options. In support of this, the University of Aberdeen is now developing (in partnership with Metro, West Yorkshire Passenger Transport Executive) a local level cost benefit tool for Local Authorities, Schools and Government to use. Crucially, this approach does not necessarily rule out a nationwide operation of yellow school buses but can be used as a means of calculating a fairer distribution of subsidy in less densely populated areas.

Far from adding to CO<sub>2</sub> emissions by switching young people from walking to travelling by bus, the central point of the Commission's report's recommendations are to take hundreds of thousands of children out of private cars and on to public transport thus saving in aggregate 130m car journeys and the corresponding 60,000 tonnes of CO<sub>2</sub>.

An argument is put forward by the response to the Commission's Report and Recommendations is that existing clusters of schools may not naturally align to meet transport needs and a strong element of co-operation between schools will be required for this to work. Whilst that may be the case this will not be known for certain until it is tried. Hence, again the need for a suitable large scale operation, targeted at primary age pupils, to confirm that all parties will work together. There may also be other benefits from emerging alliances which are discovered.

The response refer to earlier research which has shown that parents do not like mixing children from different phases of education on buses. The Commission didn't recommend this approach - it suggested sharing resources.

It is stated in the response that staggered session times are fundamental to the success of the proposal. Staggered session times are not necessary – extended school opening times allow for double running without the need to stagger school lesson times.

The provision of extended schools childcare, which is now mandatory at all schools, removes the need for schools to stagger session times. The Government wants every school to offer extended hours by 2010 as part of its Every Child Matters framework. To achieve this objective, schools will have to be open longer. The school day has been extended from 8am-6pm providing a range of core services including child care services as the minimum offer.

It is stated that schools would need to alter their times by 45 minutes to allow double running. The extended schools programme negates the need for any change of times as discussed above. Regardless of this, the change in times could be as low as 15 to 20 minutes for each school rather than the 45 minutes claimed. On the issue of changes in school times, should parents views not be as, if not more, relevant than those of the school?

The purchase cost of £84,000 per vehicle was based on a BMC not a US vehicle.

The further reference made to the inherent difficulties in finding bus drivers prepared to work part-time is not substantiated. The experience from North America is generally the reverse as there are many yellow school bus drivers with child care responsibility for which a school day only employment is most suitable. Indeed existing UK school bus provision rarely struggles to find sufficient part time driving staff.

To clarify the calculations relating to entitled pupils: The Commission assume that 75% of entitled (those currently receiving free transport) pupils within the catchment area transfer to yellow school bus services.

The 509,000 figure is made up from 75% of entitled pupils in the yellow school bus catchment using existing school bus services PLUS 30% of other non-entitled pupils in the yellow school bus catchment. A relatively small number of these, 46,000, switch over from existing school bus services. The vast majority, 346,000, switch from car.

For each of the entitled pupils at primary level who transfer to the yellow school bus service an £8 per day subsidy is transferred to the yellow school bus service. This is average cost per pupil for currently providing transport to entitled primary pupils. In total this transfer of subsidy amounts to approx 40% of current funding for entitled Primary pupils, leaving local authorities with 60% of their current funding to provide for those entitled pupils not able to use the yellow school bus services. It is accepted that it may cost more than the average daily subsidy per pupil for local authorities to transport the remaining entitled pupils not able to use yellow school bus services and so a subsidy transfer figure to yellow school bus of less than the average £8 per pupil per day may be necessary.

## **Yellow School Bus Commission Recommendation 6**

**Provide additional funding of up to £100 million for the increased availability and quality of school transport for secondary age pupils. Initially, this will use existing public services where available. Dedicated yellow school buses should be considered where issues of behaviour are particularly acute or the public services cannot cater for the demand.**

The Commission does not agree that there is no need for dedicated services. If services are not offered commercially, whilst there are many children being driven to school, then there remains an issue which needs to be addressed.

What factual evidence is there, that cycling provides an attractive alternative for distances over 2 miles? The evidence from the annual school census 2009 for

South West England shows that only 0.27% of secondary pupils cycle to school for distances > 2 miles (or 0.8% of pupils who travel > 2 miles to secondary school do so by bike). This does not suggest that cycling is likely to play an “enormous” role.

### **Yellow School Bus Commission Recommendation 7**

**A financial incentive should be given to schools that stagger their hours. The Commission recommends that within a more flexible approach to existing capital grants, annual revenue funding of up to £10,000 per school should be available via Travel Plans for new primary yellow school bus services**

A point of clarification is required: The £10,000 of new funding per school is to cover the shortfall in meeting the £42,500 operating costs. It is not in addition to the operating costs.

The WSP commentary assumed higher vehicle costs of £120,000 would increase the annual operating cost from £42,500 (used in the Yellow School Bus Commission report) to £46,500 and NOT to £60,700 as calculated by WSP.

The Commission considered £84,500 as a sensible base price for vehicles, based on the price of the BMC yellow school bus and the potential pricing of other models in due course to reflect sales volume, and thus economies in production, of a wider roll out of yellow school buses. Is £84,500 still a realistic price for a YSB?

Even if the assumed operational cost for a service using a vehicle with purchase cost of £120,000 is applied then the BCR for a national primary school Yellow School Bus roll out (using the remaining Commission assumptions and calculations) is 2.5 and NOT 1.6 as calculated by WSP. This is a significant difference. In other words, the value for money is affected but not nearly as adversely as WSP have suggested.

The success of the Primary Yellow School Bus roll out may depend on the ability to double run within the time window provided by extended schools provision rather than the requirement to stagger school session start times.

### **Yellow School Bus Commission Recommendation 8**

**The Commission appreciates that the purchase of dedicated vehicles demands significant operator investment. In order to reduce risk and uncertainty, long contracts of up to ten years should be introduced to encourage investment in school buses**

The change in contract length is welcomed, however extending to longer terms could potentially better match vehicle life, thus further reducing contract costs.

## **Yellow School Bus Commission Recommendation 9**

**In consultation with schools, parents and operators, local authorities should consider the appropriate mix of vehicles to meet needs. Cost effectiveness, quality and local circumstances such as integration with public service requirements in rural areas should be considered. Provision should also enable expansion in the number of mobility-impaired pupils travelling with their peers.**

The argument that an integrated transport operation would be more desirable than segregated yellow school bus services is, to some extent, misleading since there is not much evidence that (Government) proposals for extended school opening are informed by transport considerations. There is the added problem that outside the larger cities, existing transport services from schools often do not exist past traditional school closing times.

Whilst those with high end Special Educational Needs (SEN) requirements will always need to travel independently of the mainstream, some parents may also prefer for their children to travel with friends. How does a segregated approach to SEN transport sit with other policies for allowing children with SENs to be educated alongside their mainstream peers? SEN travel costs are very significant – this could offer a saving.

With respect to children with special needs, where possible, all children should attend mainstream schools and, as part of training for life, should experience school life as well as transport to and from school alongside their peers. The Commission's proposals deal with issues of bullying through CCTV, trained drivers etc.

The cost of anti social behaviour on double deck vehicles should not be ignored either. Provision of high capacity YSB vehicles reduces risk and cost associated with DD vehicles.

## **Yellow School Bus Commission Recommendation 10**

**Bus Service Operators Grant should be made available to operators and authorities who meet new quality standards matching those of yellow school buses, as part of the proposed funding requirement in Recommendations 5 and 6.**

The Commission's report asks for a revision on the entitlement for Bus Service Operators Grant (BSOG) to cover school transport. The question raised is that school transport services offered to attract car users should also be offered relief on fuel duty. The issue is that it is necessary to encourage more sustainable travel and BSOG could help to do this for journeys to school. Offering BSOG specifically for YSB provision would be linked to significantly improved vehicle quality and thus follow the current BSOG upgrade provision.

Whilst the Commission recognise that a change to allow BSOG for school transport would move the financial cost from one area of public sector funding to another, the current approach discourages investment in high quality school services. BSOG is an effective mechanism to reduce costs of public transport operation through a

degree of fuel duty relief. Such savings are ultimately passed on to the client and or the users.

However for the reasons outlined, any change to BSOG, must not be at the detriment of existing fuel duty relief provision through BSOG for other public transportation, as this would negate the benefits from these proposals relating to such a change and could negatively impact the opportunity for older pupils to access public bus services as advocated in Recommendation 3.

### **Yellow School Bus Commission Recommendation 11**

**Consider revising entitlement arrangements supported by improved funding as originally proposed under Pathfinder programme.**

The following evidence fairly strongly supports a 1 mile limit for yellow school bus services. Page 23 of the Commission's report provides indication of parents' willingness to pay for transport from the Commission's surveys.

The evidence from the 2009 School Census for South West England show that in the distances between 1 and 2 miles from school, five times as many primary school children are driven to school as walk (13.5% walk, 66% driven, 1.2% cycle). Whereas for distances under 1 mile 67% walk, 27% driven, 1.5% cycle. Even at the margins of the 1 mile limit between 1.0 and 1.25 miles, 18.6% walk, 1.6% cycle and 65.1% are driven. Between 1.25 and 1.5 miles 13% walk, 1% cycle and 67.3% are driven.

### **Yellow School Bus Commission Recommendation 12**

**The Commission considers that (subject to local consultation) local authorities and schools should explore private sector business sponsorship as an additional support mechanism for local yellow school bus operations.**

This is agreed. The concerns mentioned are recognised in the Commission's report and can be addressed by procuring authorities.

### **Yellow School Bus Commission Recommendation 13**

**Integrated Transport Units offer the best mechanism for procurement. Where this is not possible due to local government structure, the partnership and understanding between district council and transport authority should be developed to realise and share the benefits.**

The Commission is in agreement, however more can be done to encourage a more truly integrated approach.

#### **Yellow School Bus Commission Recommendation 14**

**Entitled and non-entitled school transport should be procured together, alongside the requirements for pupils with special educational needs attending mainstream schools.**

The Commission recognise in our report that the nature of SEN may preclude these pupils from using yellow school buses. The University of Aberdeen have not costed any transfer of SEN pupils to yellow school bus in our modelling even though this is likely to offer some significant savings to current expenditure.

Fear of bullying is an issue which should be addressed through the use of other measures; this should not be a reason not to procure better school transport. Additionally, the controlled yellow school bus model offering better driver supervision; support where necessary by escorts or mentors may provide parents with the reassurance they need.

Our comment in response to Recommendation 9 highlights the importance of encouraging SEN and mainstream pupils to travel and attend school together.

#### **Yellow School Bus Commission Recommendation 15**

**Operators and authorities should work in partnership to secure higher quality in service, vehicle standards and driver training for all public bus routes serving schools.**

The Commission fully support the use of Voluntary Quality Partnerships to facilitate further proactive and collaborative working between operators and authorities.

The Commission believes greater advances can be made in terms of training with significant benefits to drivers and more importantly users. With contracts of adequate length or suitable volume the Commission does not recognise any material difference in cost for training based on size of operator.

#### **Yellow School Bus Commission Recommendation 16**

**School bus contracts should include regular inter-peak school work, whilst other off-peak work carrying school children should also be sought.**

The Commission welcome the comments regarding the Department's approach to 3+2 seating configurations.

However, with regard to the concerns re changes to education transport requirements, whilst the revenue generation from non-education work would be lost, this would be near equal to the cost of providing this new transport provision – therefore this isn't a cost neutral result.

### **Yellow School Bus Commission Recommendation 17**

**Transport for London should consider future provision for primary age children, independent schools and those with special educational needs. There is potential for integrated dedicated services (ideally meeting yellow school bus standards) to achieve modal shift, and where possible, to reduce borough expenditure, particularly on special educational needs transport.**

The Commission note that the DfT feels it is for Transport for London (TfL) to respond to this recommendation, however it is the Commission's belief that Government has overarching responsibility for all UK transport, education and climate change policy and that it would be entirely reasonable to comment on the recommendation.

### **Yellow School Bus Commission Recommendation 18**

**The rollout of improved school transport should be conducted in parallel with continued (and perhaps expanded) capital funding for initiatives to improve walking and cycling, coupled with targets to maintain and improve share of all sustainable modes.**

The Commission's report does recognise that there is likely to be some impact on children currently walking more than 1 mile to primary school – however this would be offset by the much larger numbers of those who transfer and who were previously driven. Despite all the excellent work mentioned in the Government response (School Travel Plans, walking, cycling, healthy schools, obesity, sustainable schools etc), much of which has been on-going for some years now, this has made little impression on the travel behaviour for those primary age pupils who live over 1 mile from school – the numbers of parents driving their children these distances to school continues to increase.

This is why a complementary approach to walking and cycling initiatives is required for these longer distance journeys. This is exemplified by 2009 school census data for the South West region which shows for distances between 1.0 and 1.25 miles 20.2% of primary pupils walk or cycle while over 65% are driven.

Yellow School Bus Commission  
November 2010

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The Yellow School Bus Commission has been established to examine, review and quantify the potential benefits of dedicated home to school transport.

Established and sponsored by First, it comprises the following independent Commissioners:  
The Rt Hon David Blunkett MP (chair), John Burch, Garth Goddard and Lt Col Tex Pemberton OBE.