



## SPT Ticketing Update

**Committee** Strategy & Programmes

**Date of meeting** 18 February 2022

**Date of report** 2 February 2022

### Report by Director of Finance & Corporate Support

#### 1. Object of report

To provide an update about SPT's recent activities in relation to public transport ticketing, and to provide information about options being considered for under 22 travel on Subway in the context of the national Young Persons' Free Bus Travel Scheme.

#### 2. Background

A comprehensive Ticketing Update<sup>1</sup> was presented to Committee in November 2021 covering a wide range of SPT's activities in relation to Ticketing, including an overview of the various roles and responsibilities held by SPT.

This paper seeks to provide an update on specific Ticketing issues where there is new information to present since the previous Committee.

#### 3. Smart ZoneCard

Smart and integrated transport ticketing remains a priority for SPT in line with the Regional Transport Strategy Case for Change, and is an issue which continues to generate significant interest with partners and stakeholders. Evidence from consultation exercises and routine customer enquiries also demonstrates that there is strong public interest in smart, integrated ticketing, which would contribute to making public transport a more attractive and accessible option for travel.

As reported to the November 2021 Committee, SPT and the ZoneCard participating operators are collaborating to procure a new smart format for the ZoneCard ticket.

Delivering the ZoneCard product in a new smart format will deliver a convenient and accessible integrating ticketing solution covering multiple public transport modes. Using a single ticket loaded onto a single smartcard, customers will be able to access bus, rail and Subway travel across Strathclyde, delivering on some of the key public transport aspirations of SPT and other stakeholders. A flexible range of ZoneCard ticket types will be offered to meet the evolving travel needs of the public, and a simplified Zone structure will make Zonocard easier to understand and use. A smart format will also enable instant

---

<sup>1</sup> [https://www.spt.co.uk/media/ft1jmqi4/sp261121\\_agenda8.pdf](https://www.spt.co.uk/media/ft1jmqi4/sp261121_agenda8.pdf)

access to purchase a ZoneCard ticket product online, significantly improving on the existing arrangements.

A formal tender exercise was advertised on the public sector procurement portal (PCS-Tender) on 23 November 2021 and the deadline for tender responses was 27 January 2022.

Tender submissions are now being analysed by a panel which includes representation from the participating operators, across all modes, with a view to awarding a contract to the successful bidder. Implementation timescales will become clearer on selection of the successful bidder by the tender assessment panel acting on behalf of the ZoneCard operators.

This project is the subject of a live procurement exercise and further updates will be presented to a future Committee.

#### **4. Subway car parking/park-and-ride**

As reported to the November 2021 Committee, SPT is seeking to procure replacement car park access control and revenue collection equipment for Bridge Street, Kelvinbridge and Shields Road Subway stations. This is expected to deliver increased significantly improved reliability for customers ensuring a more seamless park-and-ride experience. The replacement equipment will also provide improved flexibility of car park pricing, and better value for money to SPT.

An Invitation to Tender was published on 20 December 2021 and the closing date for Tender submissions is 22 February 2022.

Tender submissions will be analysed with a view to awarding a contract to the successful bidder later in 2022.

#### **5. Under 22 travel on Subway**

Since 31 January 2022 all residents in Scotland under the age of 22 have been entitled to travel by bus for free, through the Young Persons' Free Bus Travel Scheme (delivered by Transport Scotland).

##### **5.1 Young Persons' Free Bus Travel: Technical implementation**

Transport Scotland are delivering the Young Persons' Free Bus Travel Scheme by issuing eligible under 22s with a new ITSO smartcard (Young Scot card). The management of card issuance and associated support is being delivered via the Young Scot teams in each Local Authority.

These smartcards are compatible with Subway ticketing devices, and can be used by customers to load Subway PAYG credit or season tickets to facilitate travel on the Subway.

Child fares are available to customers under 16 purchasing a single use Subway ticket or using a Child Subway smartcard. At present, a customer under 16 loading Subway Pay As You Go (PAYG) credit to a Young Scot card would be deducted a full adult fare at the Subway gate. This is due to a difference in the way Subway smartcards and Young Scot cards are configured to identify under 16 customers. This can be addressed by making changes at the Subway gates, which SPT is now exploring with the relevant supplier.

##### **5.2 Subway Fare Structure**

Adult and Child fares are available on Subway. Child fares are available to under 16s and are set at half the adult fare. Under 5s travel for free.

Child fares are available when purchasing a single use ticket at a Subway station (single/return/all-day), or when using a registered Child Subway smartcard with PAYG credit or a season ticket. To receive a Child Subway smartcard, an under 16 customer must provide proof of age.

### **5.3 Under 22 Free Bus Travel: Potential Impact on Subway**

The Partnership has previously been advised of the potential consequences of the implementation of the Young Persons' Free Bus Travel Scheme. The provision of free bus travel to under 22s will inevitably lead to some customers in this age range choosing to travel by bus instead of Subway, impacting on overall Subway passenger numbers and revenue. There may also be a longer term impact if under 22 customers establish long term travel habits which rely on bus rather than Subway.

At this stage holders of the Young Scot card will not have access to free travel on the Subway, although those aged under 16 will still have access to Child fares. Those aged 16 – 21 will still require to pay a full adult fare.

An estimated 17% of Subway journeys are made by customers are aged under 22, equating to more than 2.0m journeys per year in 2019-20 or a forecast 1.5m journeys per year in 2022-23 (assuming Subway usage returns to 70% of historic levels as Scotland emerges from coronavirus restrictions).

In November 2021 SPT, in conjunction with Transport for Edinburgh (TfE) wrote to Transport Scotland making a strong argument that Subway (and Edinburgh Trams) be included in the Young Persons' Free Bus Travel Scheme. This request was declined by Transport Scotland in December 2021. SPT and TfE's letter can be found in Appendix 1 and Transport Scotland's response is in Appendix 2. In addition, the matter has been raised as part of SPT's response to the Scottish budget. As outlined in SPT and TfE's letter, the inclusion of Subway and Edinburgh Trams would support the drive toward integration for users, and contribute to the reduction of car kilometres and net zero targets by giving an attractive option to support modal shift.

In response to a question raised in the Scottish Parliament on 1 February 2022, Transport Minister Jenny Gilruth extended an offer to meet with SPT to discuss this matter. SPT's Chair responded in writing on 2 February 2022 to request such a meeting, and SPT will continue to press for Subway's inclusion in the Scheme.

In recognising these issues, as well as the financial impact on SPT it is necessary to consider whether SPT will adjust its own fare structure to accommodate under 22 travel differently from the current arrangements, and what other implications may arise from these decisions.

Subway usage by under 22 customers continues to be monitored on an ongoing basis to inform SPT's understanding of the impact of free bus travel.

### **5.4 Options for Under 22 travel on Subway**

The Young Persons' Free Bus Travel Scheme has been introduced for a number of reasons including the following as stated by Transport Scotland<sup>2</sup>:

---

<sup>2</sup> <https://www.transport.gov.scot/news/free-bus-travel-for-under-22s/>

- To embed sustainable travel behaviour from a young age;
- To support young people's access to work, learning and other opportunities; and
- To reduce barriers for young people created by transport costs.

SPT is fully supportive of the above aims, and recognises that these are not exclusive to bus travel but apply to all public transport modes including Subway.

Subway is a quick, convenient and sustainable travel option for many of the journeys made by young people in Glasgow. In some cases, Subway may offer the shortest journey time for a young person's journey (for example city centre to west end in just ten minutes), maximising the potential for young people to access work, learning and other opportunities.

In this context it is appropriate for SPT to consider options for supporting under 22 travel on Subway. This paper does not constitute a formal assessment but offers a range of options which will subsequently be taken forward for further analysis.

Any more detailed work would be subject to statutory impact assessments including Equality Impact Assessment.

The following options could be implemented using either Young Scot cards or Subway smartcards for travel, and where relevant the most practical solution for a specific option has been suggested. For most of these options there would be some element of implementation cost to SPT to configure the Subway ticketing systems appropriately.

### **Option 1a: No Change**

No change to existing Subway fares for under 22 customers. Under 5s continue to travel for free, under 16s can benefit from Child fares, customers aged 16-21 pay Adult fares.

This option carries the highest risk of a proportion of under 22 customers transferring their travel from Subway to bus.

For an indication of immediate financial impact in 2022-23, this has been estimated for various scenarios as shown below:

	<b>Overall Subway patronage: 13.0m/year (2019/20 levels)</b>	<b>Overall Subway patronage: 9.1m/year (recovery to 70% of 2019/20 levels)</b>
<b>100% Under 22 transfer to bus</b>	£3.1m	£2.2m
<b>50% Under 22 transfer to bus</b>	£1.55m	£1.1m

### **Option 1b: No Change to fares, Child fares available on Young Scot card**

All Subway fares would remain unchanged, however Child (under 16) fares would be made available to under 16 customers using their Young Scot card. This would require configuration changes to the Subway ticketing system.

Since the introduction of Subway smart ticketing, the uptake of child Subway smartcards has been relatively low. This may in part be due to the application process which requires submission of proof of age along with other details before a card is issued. While adult Subway travel on smartcard has always been priced lower than adult single-use tickets, the same has not been the case for child Subway travel on smartcard.

To demonstrate the low uptake – during September 2021 there were around 2,000 Subway journeys made using PAYG on child Subway smartcards, while more than 26,000 journeys were made using child single-use tickets (single/return/all-day).

The introduction of the Young Persons' Free Bus Travel Scheme will result in most under 16s already having a smartcard which could be used for Subway travel (and which is encoded in such a way that customer under 16 can specifically be identified), and it would improve convenience for these customers if Child fares were made available to Young Scot cards.

This option would not reduce the risk of customers transferring from Subway to bus for cost reasons, but would increase integration and convenience for some under 16 customers.

### **Option 2: Free Under 22 Subway Travel funded by Young Persons' Free Bus Travel Scheme**

This would involve Subway becoming part of the above scheme along with bus operators. Under 22 customers would travel for free on Subway using their Young Scot card. Reimbursement for these journeys would be made by Transport Scotland to SPT at an agreed rate.

This option has already been declined by Transport Scotland in December 2021. Transport Scotland's letter to SPT stated "no plans to provide funding to support free travel for under 22s on SPT Subway at this time" – this should be kept under review in case circumstances change. Indeed, SPT will continue to make the case for Subway inclusion, in support of the scheme objectives, as a key element of the public transport offering in the west of Scotland.

This option would remove the cost motivation for some under 22 customers to transfer their travel from Subway to bus.

### **Option 3: Free Under 22 Subway Travel funded by SPT**

Under 22 customers would travel for free on Subway using their Young Scot card. The impact of lost revenue (estimated at than £3.1m based on 2019-20 usage or £2.2m based on recovery to 70% of 2019/20 usage levels) would be borne by SPT, and therefore by local authorities via an increased requisition.

This option would remove the cost motivation for some under 22 customers to transfer their travel from Subway to bus. However, this option must be considered in the context of the overall SPT revenue budget position (see Agenda Item 5, Draft Revenue Budget 2022/23) with any reduced income from free acceptance of Young Scot cards requiring to be balanced by a reduced expenditure elsewhere in the provision of services by SPT, or an increase in the local authority requisition.

### **Option 4: Free Under 22 Subway Travel funded by SCTS (Strathclyde Concessionary Travel Scheme)**

Under 22 customers would travel for free on Subway using their Young Scot card. SPT would be reimbursed for these journeys by the Strathclyde Concessionary Travel Scheme at an agreed rate.

It is likely that this would be severely challenging due to financial pressures already facing the Strathclyde Concessionary Travel Scheme and would require full consideration by SCTS including the impact on other transport modes. This would likely require the provision of additional funding from Local Authorities to cover these costs.

This option would remove the cost motivation for some under 22 customers to transfer their travel from Subway to bus.

### **Option 5: Reduced fares for under 22s**

As an alternative to providing free Subway travel for under 22s, a reduced fare could be offered instead. This could be funded by Transport Scotland, by SPT, or by the Strathclyde Concessionary Travel Scheme.

A reduced fare would offer some benefits to customers, and may reduce the transfer of journeys from Subway to bus. The cost to a funding organisation would be clearly be less than for the provision of free travel.

This could be achieved by extending the existing eligibility for Child fares from under 16 to under 22. Alternatively, the concession fares currently payable by eligible 60+/disabled customers could be applied for 16-21 year olds, with under 16s continuing to pay Child fares.

Estimates of the revenue impact would be dependent on the exact details of proposed fares and the implementation dates. Provision of half fares for all under 22s would have an approximate revenue impact in the range £0.5m to £1.5m (based on the estimated impact of completely free travel in Option 1).

This option would reduce but not remove the cost motivation for some under 22 customers to transfer their travel from Subway to bus.

### **Option 6: Specific ticketing offers**

Instead of pricing changes applicable to all under 22 customers and journeys, specific targeted ticketing offers could be made.

These could be delivered on Young Scot card or using the Subway smartcard, and could be funded by any of SPT, Transport Scotland or Strathclyde Concessionary Travel Scheme.

Options to consider would include (but are not limited to):

- Free travel for under 16s, at all times or at selected times (for example during school holidays).
- Reduced price season ticket: a Child (under 16) annual Subway season ticket already offers excellent value at £245. This could be further reduced to offer low cost Subway travel to those under 16 customers making extensive year-round use of the Subway. For example at £150 this would represent less than £3/week for unlimited Subway travel for under 16s. This would preserve some revenue for Subway while offering an attractive price to the customer. Revenue from sales of under 16 tickets accounts for less than 3% of overall Subway ticket revenue

(2019-20 data). Therefore, any change in ticket purchase patterns among under 16s will have a proportionally small impact on overall Subway ticket revenue.

- “Young persons” pricing for 16-21 year olds. Ticket prices for 16-21 years olds which are less than full adult fare, but more than child (under 16) fares. This option has a disadvantage of adding complexity to the Subway fare structure.

Estimates of the cost impact would be dependent on proposed options and implementation dates.

This option would reduce but not remove the cost motivation for some under 22 customers to transfer their travel from Subway to bus.

## **5.5 Next Steps for Under 22 travel on Subway**

The Young Persons' Free Bus Travel Scheme was launched on 31 January 2022 with the Subway excluded from the Scheme.

The impact of the scheme on Subway patronage and income is subject to a high degree of estimation as at this stage we do not have data on the uptake of Young Scot cards for free bus travel. In addition, it will take some time to establish robust data relative to individual travel behaviour change, albeit the existing under 22 Subway usage estimates are based on reliable smartcard data.

Similarly, the options identified in 5.4 require detailed analysis to determine the potential cost and patronage impacts.

It is therefore proposed to monitor the direct impacts from 31 January 2022 whilst further analysing the options identified in section 5.4.

## **6. Committee action**

Members are asked to note the contents of this report and the intention to carry out further more detailed analysis of options for under 22 Subway travel, to continue engagement with Transport Scotland on the inclusion of Subway in the Free Travel Scheme, and to report to a future committee in 2022-23.

## **7. Consequences**

Policy consequences	<i>The development and delivery of smart and integrated ticketing is a key objective of our Regional Transport Strategy and the Scottish Government National Transport Strategy.</i>
Legal consequences	<i>None within this report.</i>
Financial consequences	<i>None within this report.</i>
Personnel consequences	<i>None within this report.</i>
Equalities consequences	<i>None within this report.</i>
Risk consequences	<i>None within this report.</i>

**Name** Neil Wylie  
**Title** Director of Finance & Corporate Support

**Name** Valerie Davidson  
**Title** Chief Executive

For further information, please contact *Michael Nimmo, Ticketing Commercial Team Leader* on 0141 333 3234.



## APPENDIX 1

08 November 2021

**CONFIDENTIAL**

By email only:

Mr Roy Brannen  
Chief Executive  
Transport Scotland

**Our ref:** PRJ\_3305\_09\_03\_8443LMJB  
**Your ref:** -  
**Direct Dial**  
**Direct fax:**  
**Email:**

Dear Roy,

### **Free travel for Under-22s on the Glasgow Subway and Edinburgh Trams**

Strathclyde Partnership for Transport (SPT), the Regional Transport Partnership for the west of Scotland, and Transport for Edinburgh (TfE), the parent company of Lothian Buses and Edinburgh Trams, have joined forces to write to you requesting that the Scottish Government's free bus travel for all under-22s in Scotland be extended to include the Glasgow Subway and Edinburgh Trams.

Both systems offer quick, convenient, low carbon travel options in Glasgow and Edinburgh and it is essential that young people have the best possible opportunity to benefit from these.

SPT and TfE strongly support the Scottish Government's commitment to making bus travel free for all residents in Scotland under the age of 22 from 31 January 2022. We know that transport costs can limit young people's opportunities and travel horizons, affecting their access to education, training, employment and leisure activities. Tackling inequalities of access is particularly critical in our cities: in Glasgow, around three in every 10 children live in relative low income families and more than 40% of local areas are ranked in the highest levels of income deprivation in Scotland. Similarly, in Edinburgh an estimated 23% of children grow up in relative poverty and every ward in the city registers a child poverty rate of at least 10% after housing costs. We consider that free bus travel for under-22s is a much needed, positive step towards tackling poverty, reducing inequality and ensuring public transport can better meets the complex needs of young people and their families.

However, we also believe that the scheme should be extended to cover travel on the Glasgow Subway and Edinburgh Trams, which play an essential role complementing bus services as part of an integrated public transport network. These systems are in a strong position to deliver on the objectives of the scheme and will be disproportionately impacted if not included. This impact may affect the ability to realise the full benefits of current and future Scottish Government investment in mass transit systems in Glasgow and Edinburgh, as well as reduce the opportunity for young people to use the mode best suited for their travel needs.

Further, in extending the scheme to the Subway and Trams, there is a huge opportunity to improve integration and complementarity between those networks and local bus services, which in turn, would help support Scottish Government policies around the climate emergency, green recovery from the pandemic, and promotion of sustainable travel habits.

## **The Glasgow Subway**

Glasgow's Subway is operated by SPT and pre-Covid carried around 13 million journeys annually across a network of 15 stations. Like other public transport modes, passenger numbers have been impacted during the Covid period, with financial year 2020/21 seeing demand for Subway travel fall as low as 20% of typical levels. The easing of restrictions means Subway is now seeing signs of recovery; however, patronage remains at around only 60% of historical demand. The resultant and on-going loss of revenue has meant Subway to date has relied on just over £16 million of Scottish Government emergency funding - part of an overall £34 million support package for light rail operators including Edinburgh Trams in recognition of the role both modes continue to play in ensuring those who need to travel during the pandemic can continue to do so.

The Subway provides direct access to seven Scottish Higher and Further Education institutions located in Glasgow. This means that 108,000 students are enrolled at institutions within the Subway catchment – nearly one-fifth of all enrolments across Scotland. It is not surprising, therefore, that many young people rely on the Subway for their everyday travel needs. SPT data shows that over 2 million Subway journeys (17%)<sup>3</sup> are made by passengers aged under 22 each year. SPT already supports young people to access Subway's best value fares through a range of information and behaviour change activities at universities and colleges and family-friendly promotions; however, free travel would clearly ensure cost of fares is not limiting any young person's opportunities.

Further, SPT's analysis of Subway travel by young people and the local bus network finds that a large number of young people who travel by Subway are likely to switch to bus to benefit from free travel. In doing so, they would lose out on the benefits of Subway's quick, convenient service which they currently enjoy. This would also lead to SPT potentially losing up to £3 million per annum, or 15% of total annual ticket revenue. This potential loss of income may affect the full realisation of benefits from the Scottish Government's £288 million investment in Subway Modernisation. Furthermore, SPT is working with our local, regional and national partners to develop the case for investment in the Glasgow Metro. The fully modernised Subway, providing 2 crucial crossings of the River Clyde and an existing smart ticketing system, will be integral to a future mass transit system for Glasgow. Significant loss of market share for the Subway may make it more difficult to make the case for investment in future mass transit for the city.

Finally, SPT believes it is important to ensure young people have travel alternatives and are able to choose the best mode for their journey. Our passengers' safety and security is at the core of our customer promise and passengers tell us they are highly satisfied with their safety when travelling with us - with 93% of passengers satisfied with personal safety at the station and 88% satisfied when on board a train.

Glasgow Subway Passenger Survey:

<https://www.transportfocus.org.uk/publication/glasgow-subway-passenger-survey/>

## **Edinburgh Trams**

Edinburgh Trams is the award-winning operator of the city's tramway, with a vision to be an integral part of the future success of Edinburgh and the Lothians by providing world class, environmentally friendly and socially inclusive transport. With services from every three minutes to 16 locations across the city and by connecting Edinburgh Airport to the heart of the city in under 35 minutes, Edinburgh Trams offers a high-quality transport choice, for residents and visitors to the city. The addition of new services, industry-leading

---

<sup>3</sup> 2019-20 Subway patronage data

levels of customer service and a range of dynamic initiatives have all contributed to Edinburgh's tramway becoming one of the UK's most successful transport systems.

Transport for Edinburgh wrote to Transport Scotland Director, Alison Irvine on 27 May 2021 to express concerns regarding the consequences and financial implications for Edinburgh Trams and the Edinburgh Cycle Hire Scheme, of the proposed young persons' concession. Director Laura Murdoch's response of 15 June 2021 stated that "concessions on the Edinburgh Tram and the terms of reimbursement for them, are a matter for The City of Edinburgh Council" Further discussions with Officials have indicated that there is little appetite to include Edinburgh Trams (and the Subway) in the U22 concession scheme. Our concerns relate to the loss of annual revenue, ITRO £1.5M for the 11 months of 2022, (an estimate that will grow in line with patronage recovery) coupled with the added pressure on the bus network if U22 concessions are not available on trams, the ability of City of Edinburgh to reimburse ETL and the impact on cycle hire schemes. Why would a young person hire a cycle, when they can get a free bus?

The financial impact of this will be further compounded when Edinburgh Trams begin operations on the completed line to Newhaven in mid-2023. The annual revenue loss attributed to this policy is then expected to rise above the £3m per annum.

Given these significant consequences and concerns the City of Edinburgh Council also intend to write to The Cabinet Secretary for Finance and the Economy regarding this matter.

### **Conclusion**

Based on the above evidence, we are sure you will agree there is a compelling case to extend free travel for under-22s to the Glasgow Subway and Edinburgh Trams. However, we recognise the potential funding complexities this may involve. As alternative, we would seek your agreement to fund the acceptance of the under-22s on both systems if included as part of local concessions schemes operating in our respective areas.

We urge you to give due and serious consideration to our proposal.

We look forward to hearing from you and would, of course, be happy to discuss this further with you.

Yours sincerely,



.....  
**Valerie Davidson**  
**Acting Chief Executive**  
**Strathclyde Partnership for Transport**  
**131 St Vincent Street**  
**Glasgow G2 5JF**

.....  
**George Lowder MBE**  
**Chief Executive**  
**Transport for Edinburgh**  
**55 Annandale Street**  
**Edinburgh EH7 4AZ**

**CC:**  
**Local Authority Chief Executives in SPT and Edinburgh areas.**

## APPENDIX 2

Bus, Accessibility & Active Travel  
Transport Scotland

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF  
Direct Line: 0141 272 7170  
concessionarytravel@transport.gov.scot



Valerie Davidson  
Strathclyde Partnership for Transport  
Pamella.Lawrence@spt.co.uk

Your ref:  
PRJ\_3305\_09\_03\_8443LMJB

Our ref:  
202100254747

Date:  
2 December 2021

Dear Valerie Davidson,

Thank you for letter of 9 November 2021 about free travel for Under-22s on the Glasgow Subway and Edinburgh Trams and the potential to extend the upcoming free bus scheme for under 22s to include the subway and the tram.

As you may know, the legislation underpinning the Young Persons Free Bus Scheme (YPS) has been modelled on the administrative and delivery arrangements that apply to the current Older and Disabled Persons Scheme (ODPS). The eligible services for the YPS remain the same as those covered under the ODPS and the legislation to allow Scottish Ministers to establish the YPS, which was passed in March 2021, does not cover modes other than bus.

I agree that there will be some uncertainties arising from the introduction of the YPS regarding bus patronage and its impacts on other modes and the provision of services by Local Authorities. We are working with ATCO and COSLA to try to quantify where Local Authority budgets might be impacted both positively and negatively by the introduction of the scheme and I believe you have been involved in discussion of this nature with Transport Scotland officials relating to potential impacts on tram and subway patronage. We do not however have any plans in advance of the scheme going live to provide offsetting funding or conversely claw back any expected savings, due to the introduction of the scheme. Impacts on other modes will be something which we will have to collectively monitor once the scheme is up and running.

Your letter raises an interesting point regarding the interaction between modes and the potential benefits to young people of being able to travel for free on the tram or the subway. As I explained above, the YPS is restricted to free bus provision, however Strathclyde Partnership for Transport and the City of Edinburgh Council can choose to provide free travel for the benefit of their residents if they consider it appropriate.

Providing such concessions for under 22s would allow residents to benefit in the same way as older and disabled people currently benefit from the local concession schemes provided by SPT and the Council for holders of travelcards under the ODPS. As things stand currently, as with all local concession schemes, the provision of travel and the reimbursement terms associated with it are a



matter for the local authorities in question.

Whilst, as set out above, we have no plans to provide funding to support free travel for under 22s on the Edinburgh Trams and SPT subway networks at this time, you will be aware that we are developing our analysis to assess the policy challenges and options for the future of public transport.

As you are aware, the impact of Covid-19 on travel demand and resultant demand for public transport has had a significant impact on public transport fare box revenue across all modes. To date, support of over £1 billion has been provided to support public transport operators during the pandemic to ensure that services remained in place for those who depend on them.

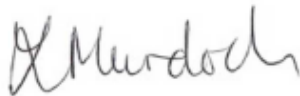
Covid Recovery, supported by a safe and confident return to public transport is crucial to ensure there is a viable and sustainable public transport system for the future.

The work required to prepare measures to enable a safe and confident return to public transport is being taken forward to not only support Covid-19 Recovery but also to ensure there is a viable and sustainable public transport system for the future.

We are also developing our analysis to assess the policy challenges and options for the future of public transport. This work is being taken forward as part of our Fair Fares Review to ensure a sustainable and integrated approach to public transport fares, looking at the range of discounts and concessionary schemes which are available on all modes including bus, rail and ferry and will look at both cost and availability of services. We will continue to engage with both TfE and SPT as part of our regular engagement and communication, and to discuss your input to the Fair Fares Review.

I hope this letter has been helpful in clarifying our position.

Yours sincerely



Laura Murdoch  
**Director of Bus, Accessibility & Active Travel**