



Public Accounts Committee Home-to-School Transport Written Evidence

November 2025

About ADEPT

The Association of Directors of Environment, Economy, Planning & Transport (ADEPT) is the voice of place directors who are responsible for providing day to day services including local highways, recycling, waste and planning, whilst preparing for the longer term.

ADEPT is a membership based, voluntary organisation with members across England. We bring together directors from county, unitary, metropolitan and combined authorities, along with sub-national transport bodies and corporate partners drawn from key service sectors.

ADEPT members develop long term strategies, investment and infrastructure needed to make their places resilient, sustainable, inclusive and prosperous. They drive clean, sustainable growth, delivering the projects that are fundamental to creating more resilient communities, economies and infrastructure. These services include housing, environmental and regulatory services, planning, economic development, culture and highways and transport.

ADEPT develops, supports and represents members to make their places more resilient, sustainable, inclusive and prosperous, leading the transformation of local authorities. We proactively engage with central government on emerging issues, promoting initiatives aimed at influencing policy, regulation and funding, developing best practices and by responding to government initiatives and consultations.

For more information on ADEPT please visit the website: www.adeptnet.org.uk

1. Introduction

This document is ADEPT's written evidence to support further scrutiny of Home-To-School Transport (HTST) by the Public Accounts Committee (PAC).

This written evidence has been informed by input from ADEPT's HTST Working Group. The group was established in 2023 to help bring together officers from local authorities working within transport and education departments. They are focused on the sharing of best practice, tools and other useful information via "Spotlight Sessions" with updates from regular contributors.

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This written evidence has also been informed by two reports published by ADEPT on HTST:

- The Final Report from the Association of Directors of Child Services (ADCS) and ADEPT Working Group on HTST published in November 2023 which sets out shared proposals to make the system more sustainable. And
- ADEPT's SEND Transport Toolkit also published in November 2023 which identifies mitigation measures to address challenges across SEND transport. The purpose of this is to help local authorities manage demand and cost associated with Special Educational Needs and Disabilities (SEND) transport locally.

This response is framed around the National Audit Office's (NAO) Home to School Transport Report dated 31 October 2025. It focuses on the key factors contributing to rising HTST costs and how HTST costs could be better managed to achieve efficiencies, better value for money and more positive outcomes for young people.

The remainder of the report is structured as follows:

- **Section 1:** Provides a high-level overview of the main challenges facing local authorities in delivering home-to-school travel.
- **Section 2:** Discusses opportunities to better manage demand for home-to-school transport.
- **Section 3:** Discusses opportunities to better support young people.
- **Section 4:** Discusses opportunities to contain costs.
- **Section 5:** Concludes, calling for a coordinated approach to addressing HTST issues and a review of the whole system.

1. The Challenge

Escalating Home-to-School Transport Costs

Home-to-school travel costs have become one of the most significant spending pressures for local authorities. These expenses often represent a substantial share of budgets, with ADEPT members reporting that transport can account for 50–90% of education budgets and approximately 10% of overall local authority expenditure.

There are many and varied reasons as to why LAs are experiencing such a rise in demand on their budgets allocated to transporting pupils across their jurisdictions. Not

one of these has a magic fix, silver bullet or unexplored option. The ADEPT working group which comprises of over 80 Local Authorities work transparently to offer good practice and any activity which has reduced or at least contained cost.

The reasons for these increased costs include but are not limited to sufficiency of placements in a local area, sharp rises in commissioned transport costs, with authorities incurring substantial expenses even for short journeys. Limited capacity for challenge of escalating transport costs, a steep increase in EHCPs awarding transport eligibility to the pupil.

Rising demand from pupils with SEND and EHCPs

One of the main reasons for HTST costs rising, is increased demand. This is largely driven by more pupil placements in Non-Maintained Special Schools (NMSS), Alternative Provision (AP), and Education Otherwise Than at School (EOTAS). These settings often require bespoke transport arrangements. This is linked to the growing number of pupils with SEND and Education, Health and Care Plans (EHCPs) that identify a transport need.

Increased reliance upon private taxis

The increased need to provide dedicated transport for pupils with SEND attending specialist schools has resulted in local authorities relying more heavily on expensive taxis.

This challenge is compounded by broader system-wide issues, including:

- A shortage of local placements for pupils with SEND, requiring them to travel long distances—often by taxi – making single occupancy the only available option
- A shortage of taxi drivers, creating high demand and pushing supply costs higher.
- Limited fleet capacity, difficulties recruiting drivers and personal assistants, and the absence of a volunteer driver network.

Interpretation of existing policy and legislation

There is significant ambiguity within existing statutory guidance—particularly for post-16, AP, EOTAS, and INMSS. This situation results in varied interpretations and confusion by parents and local authorities. As a consequence, there is often an over-provision of services and a rise in appeals from parents when transport is denied.



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Conflicts between the Children and Families Act 2014, school admission codes, and HTST guidance further complicate delivery, while vague language in policy documents results in unrealistic expectations and over-provision.

Strong statutory duties limit local flexibility, especially in disputes escalated to the Ombudsman. Additional constraints include PSVAR compliance requirements, slow policy change, and limited understanding of statutory roles among education and health teams.

Coordination between different local authority teams

At a local authority level, SEND placement decisions by education teams are often disconnected from transport planning, with poorly aligned data systems and limited cross-service collaboration. This can result in the need for local authorities to transport pupils' long distances at considerable expense.

Local government reforms could lead to a more fragmented system

Proposed restructuring associated with local government reforms risks creating a fragmented system where transport remains locally managed even when schools fall outside local authority boundaries. There is a risk that boundary reorganisations may not reflect where children live and where they attend school, adding further complexity to the future management and coordination of home-to-school travel.

2. How to manage rising demand

Provides better clarity to parents and local authorities on HTST eligibility through comprehensive policy reform

The most impactful change to manage rising demand is comprehensive policy reform of statutory guidance to provide better clarity to local authorities and parents on HTST eligibility. This will help reduce overprovision and challenge from parents through appeals.

This should include reducing the influence of parental preference in school choice, aligning placement decisions with transport eligibility, prioritising the nearest suitable provision, and updating procurement regulations.

These reforms would help to simplify decision-making and reduce complexity for local authorities, enabling resources to be focused on pupils with complex requirements who require bespoke transport arrangements.

As a part of this, a review of tribunal processes for SEND placements is needed. This could help reduce costly and impractical transport obligations.

Funding reform is also essential part of this. One option to address this is a centrally allocated funding model based on distances travelled by means-tested eligible pupils, as reported by local authorities. This approach would reflect the higher costs incurred by rural authorities, where reliance on taxis is often greater.

Eligibility reviews

Alongside clear eligibility criteria, eligibility reviews should be undertaken regularly to ensure transport provision aligns with statutory duties and individual needs. Local authorities must apply clear criteria based on Education, Health and Care Plans (EHCPs) and national policy, supported by tools like eligibility matrices. Regular reassessment helps avoid unnecessary provision and ensures suitability. These measures lead to cost avoidance, better resource allocation, and reduced solo journeys, while maintaining compliance with SEND legislation.

Better management of parental expectations

There is also a need to manage the expectations of parents of pupil with SEND, as often there is an expectation that one-to-one transport will be provided. When this expectation is not met and an alternative provision is offered, it can lead to disputes and additional costs for the local authority.

This issue is often linked to parents' prior experiences in securing appropriate educational support for their child, which often involves lengthy processes and, in some cases, appeals to obtain a school place and transport. To address this, it is important policy and eligibility criteria are clearly communicated to parents from the outset and applied consistently across all local authorities.

Streamline taxi license applications

Delays in processing taxi license applications often result from overly complex procedures, which impedes the onboarding of new drivers. This shortage contributes to higher supply costs. To improve efficiency, these processes should be simplified. This should include making sure that taxi license applications are managed at the same level of government as HTST.

Improved standardisation of software and tools used by local authorities to make HTST decisions



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Members of ADEPT's HTST working group currently use a wide variety of tools and software packages to make their HTST decisions. There is an opportunity to help improve decision making through standardising and strengthening digital tools for SEND decision-making. This would help improve efficiency, transparency and delivery.

3. Available support for young people

Improve local support for pupils with SEND

There is a need to enhance provision for pupils with SEND within mainstream schools. Strengthening local support will:

- Minimise travel distances for pupils with SEND and in turn reduce transport costs for local authorities.
- Potentially reduce or eliminate the requirement for dedicated transport services as the pupil may be able to travel to school independently by existing public transport services or on foot.

Increase capital funding of specialist schools for pupils with SEND

More capital investment and Dedicated Schools Grant (DSG) revenue is needed to provide and fund specialist schools in the local community. The current shortage of local provision remains a significant factor contributing to extended travel distances and an increased reliance on taxi services for transporting pupils.

4. Efforts to contain costs

Improve coordination of placements and HTST at a local level

The separation of decision making on school placement and transport within local authorities is a significant issue. Improved internal coordination—particularly between home-to-school travel teams and Education, Health and Care Plan coordinators — would help prevent disjointed decisions and enhance efficiency.

Alongside this, the provision of greater powers to local authorities to integrate bus services with school schedules to help reduce the use of solo routes. This would help local authorities avoid the need for providing dedicated bus services.

Use of Route Planning & Optimisation Software

Improved route planning and optimisation can help local authorities reduce costs and improve efficiency of delivering HTST. This includes consolidating journeys through “one school, one operator” models, reducing solo trips, and using data-driven tools for forecasting and route optimisation. These measures aim to maximise vehicle

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occupancy, minimise mileage, and ensure resources are deployed effectively. The impact is improved operational efficiency, better use of budgets, and improved forecasting.

Provide SEND Pupils with Independent Travel Training

Provision of solo transport for pupils with SEND is a significant cost for local authorities. Independent Travel Training can equip young people with SEND the skills to travel safely and confidently on their own, using public transport or walking routes. ITT reduces reliance on specialist transport and promotes independence. Initiatives include creating dedicated ITT teams and structured programs, often supported by passenger assistants during early stages. This has the potential to reduce demand for bespoke transport services and helps improve life skills for pupils.

Commissioning Strategies

The use of different commissions strategies can help reduce dependency on traditional vehicle-based solutions. This could include parental allowances, school-funded minibuses, and capital investment in facilities. The outcomes include increased supply flexibility, reduced demand for contracted transport, and significant cost savings.

Provide Pupils with Personal Travel Budgets

Personal Travel Budgets offer families a financial allowance to arrange their own transport solutions and can be a cheaper alternative to the provision of dedicated transport. This approach provides flexibility, choice, and control, enabling parents to tailor arrangements to their child's needs. Personal Travel Budgets can be offered as a "first offer" instead of high value dedicated single occupancy transport. This can help increase efficiency and ensure better use of local authority resources.

Supply Management & Market Strengthening

Local authorities could collaborate with transport operator to increase resources. Actions include engaging with local taxi and minibus operators, introducing targeted licensing schemes, and supporting initiatives like school-run taxi licenses. These measures aim to improve service quality, ensure compliance, and build resilience in a market facing capacity challenges. Strengthening supplier relationships helps secure long-term sustainability and competitive pricing.

Review the Public Service Vehicles Accessibility Regulations

Permitting local authorities to sell seats on vehicles used for transporting pupils could help offset costs and generate additional revenue. Currently, many home-to-school



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transport services operate under Section 19 or 22 permits (Transport Act 1985), which allow “not-for-profit” services without a full PSV operator licence. These services are not open to the general public, so selling tickets would breach permit conditions.

If services were opened to fare-paying passengers (e.g., children without statutory entitlement), vehicles would require full PSVAR compliance—something many school transport vehicles currently lack. It is considered that, because reasonable adjustments are already made for pupils with SEND, no additional adjustments are necessary.

5. Summary

A whole-system issue

The challenges faced by local authorities in delivering HTST are not isolated to a single aspect of service delivery. Instead, they represent a complex, interconnected “whole system issue” rooted in the way education teams, transport planners and transport providers interact and depend on each other.

Addressing these challenges requires coordinated action across all these areas, rather than piecemeal solutions at individual points in the process. Only through integrated efforts can the system become more efficient, sustainable, and responsive to the needs of young people.